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# Colorado Environmental Performance Partnership Agreement

## FY2014 End of Year Assessment

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An Assessment of Environmental Accomplishment and  
Challenges for the Period of October 1, 2013 through  
September 30, 2014

**December 2014**



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## 1.0 Introduction to the End of Year Assessment

The Colorado Environmental Performance Partnership Agreement (CEPPA) is an agreed-to plan between the Colorado Department of Public Health and Environment and Region 8 of the Environmental Protection Agency to address environmental issues and problems in Colorado. It reflects commitments made by both agencies to environmental management.

The CEPPA document:

- 1) Defines the roles of the Colorado Department of Public Health and Environment (CDPHE) and Region VIII EPA;
- 2) Identifies the overall priorities for environmental protection in Colorado; and,
- 3) Describes what the state and federal environmental program efforts will be to protect air, water and the land.

The FY2014 CEPPA includes work plans (environmental health/sustainability, air, water, waste) funded, in part, from the Performance Partnership Grant (PPG) as a part of the comprehensive environmental program plan for Colorado. The purpose of this report is to describe the program accomplishments for the grant period from October 1, 2013 through September 30, 2014.

This report also is intended to fulfill the requirement of the PPG program grant awarded to the state by EPA for an end-of-year assessment. This was conducted during the period of November through December 2014 by the CDPHE Environmental Programs. Areas assessed include all program activities and accomplishments for all media. This report will be used, along with other guidance, as part of the ongoing PPA update process.

This report is intended to provide an overview of the progress of environmental management in addressing air, water and waste issues in Colorado.

This assessment was completed by CDPHE program staff and to some degree by EPA Region 8. This assessment is part of the continuing cycle of interagency planning and implementation to address the major environmental concerns in Colorado.

## 2.0 Division of Environmental Health and Sustainability - FY 2014 Work Plan Status and Accomplishments

SUSTAINABILITY PROGRAM			
SUPPLEMENTAL ENVIRONMENTAL PROJECTS			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities; Goal 4-Objective 4.2: Promote Pollution Prevention; Goal 5, Objective 5.1: Enforce Environmental Laws			
Subgoals	Objectives	Timeline	Performance Measures
Support and advise Cross-Media Enforcement Team (CMET) on SEP related issues.	Review SEP and Eligible Governmental Entity policies annually and make recommendations to CMET as needed.	Annually	# of policies reviewed: 1 # of CMET meetings attended: 0
Increase efficiency of SEP program	As requested by environmental divisions: coordinate directly with the enforcement action respondent to present SEP policy and assist in finding appropriate SEP ideas; analyze and evaluate SEP proposals; track project progress and interim deadlines; and review SEP Completion Reports.	Ongoing	Coordinated SEP ideas with 10 regulated entities # of SEPs evaluated: 12 # of SEP Completion Reports reviewed: 25
	Administer SEP idea database; develop and administer the department's SEP website; develop annual SEP Report to track environmental outcomes from SEPs.	Ongoing	# of new SEP ideas included in database: 15 # of hits on SEP website: 141 (Data only available for July 1 thru September 30, 2014 due to web site migration). Environmental outcomes from SEPs are tracked using an internal Sharepoint site and available upon request.

SUSTAINABILITY PROGRAM			
CROSS-MEDIA AND SECTOR INITIATIVES			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.2: Promote Pollution Prevention; Goal 5, Objective 5.1: Enforce Environmental Laws			
Subgoals	Objectives	Timeline	Performance Measures
Assist with CDPHE innovations and cross-media approaches.	Coordinate compliance assistance efforts between programs, including sharing information, data and referring facilities.	Ongoing	# of facilities provided cross- media compliance assistance: None
	Cross-train compliance assistance providers.	Ongoing	# of individuals trained and hours of training: No activity
	Continue to hold regular workgroup meetings to discuss cross-media opportunities.	Ongoing	Outcomes and outputs of meetings – post achievements on Department's website  Held 4 meetings of the Cross-Media Innovations and Strategy Team
	Environmental Results Program		For details refer to Water Quality Control Division and Hazardous Materials and Waste Management Division Chapters 5 and 6.
Integrate successful initiatives into traditional environmental programs.	Integrate Environmental Results Program into environmental divisions.	Ongoing	# of ERP projects implemented: None  lbs./tons pollutants reduced

SUSTAINABILITY PROGRAM			
EMERGING ENVIRONMENTAL ISSUES			
Supports EPA 2011-2015 Strategic Plan Goal 1- Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3- Objective 3.2: Preserve Land; Goal 4-Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Performance Measures
Reduce pharmaceuticals in the environment.	Implement and assess pilot project for collection of unused and unwanted household medications.	FY 2014	<p>Lbs./tons of medications collected: 10,077 lbs collected</p> <p># of project inquiries: 175</p> <p>852 web site hits (Data only available for July 1 thru September 30, 2014 due to web site migration).</p> <p># of locations added: 12 law enforcement collection sites added</p> <p># and amount of donations received: 5 donations totaling \$25,500 (includes \$5,000 legislative appropriation)</p>
	Develop strategies for implementation of sustainable, state-wide household medication take-back programs. Continue stakeholder engagement, focusing on law enforcement, pharmacies and funding sources.	FY 2014	<p>Program development: Worked with Prevention Services Division to create new law enforcement-based network of permanent collection sites capable of collecting prescribed controlled substances along with other medications.</p> <p>HB14-1207, signed by Governor in May 2014, gives liability protection to take-back program collectors, transporters, and disposal facilities</p> <p># of stakeholder meetings: Moderated 1 meeting of the Colorado Household Medication Disposal Stakeholders.</p> <p>Participated in 9 meetings of the</p>

			Safe Disposal Work Group of the Colorado Consortium for Prescription Drug Abuse Prevention
	Assist with the problem identification and outreach efforts surrounding PIE.	Ongoing	# of stakeholders contacted # of projects initiated Assisted DEA with National Take-Back Events held 10/26/13, 4/26/14, and 9/27/14. Total of 58,366 pounds of medications collected in Colorado
Reduce mercury in the environment.	Implement Supplemental Environmental Project (SEP) programs for reducing mercury in Pueblo area.	Completion: 12/31/14	2 Hg-related projects in Pueblo are ongoing and scheduled for completion 12/31/14.
	Set-up mercury recycling programs (CFLs, thermometers, auto switch, etc.).	Completed	#of projects implemented and resulting environmental outcomes: No new programs this year. Continue to track Colorado performance in the National Mercury Vehicle Switch Recovery Program. Colorado is consistent top-10 performing state.
Develop processes and systems to address emerging contaminants.	Coordinate with appropriate health divisions to address health and environmental issues.	Ongoing	# of programs/projects implemented # of environmental outcomes Prevention Services Division staff are included as members of the Safe Disposal Workgroup of the Colorado Consortium for Prescription Drug Abuse Prevention and are assisting in efforts to expand medication take-back opportunities state-wide Continue to share information and explore opportunities through CMIST

	Assess data to determine both the significance and scope of the problems affecting the well-being of Colorado's citizens.	Ongoing	Assessment completed and valid use of data  Determine data gaps  Continued tracking on-going national data gathering efforts and studies of environmental and public health impacts  Continued participation in Consortium for Research and Education on Emerging Contaminants (CREEC)
	Identify environmental trends and respond with innovative ideas	Ongoing	Trends identified
<b>SUSTAINABILITY PROGRAM</b>			
<b>SARA PROGRAMS</b>			
<b>Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.2: Promote Pollution Prevention</b>			
<b>Subgoals</b>	<b>Objectives</b>	<b>Timeline</b>	<b>Performance Measures</b>
Effectively and efficiently implement the EPCRA/SARA Title III TRI and Tier II programs including all associated databases.	Receive and enter TRI (using the Exchange Network) and Tier II data from Colorado businesses (9,000 facilities; 16,000 chemicals).	Ongoing	Timely and effective data entry – There was a slight delay in 2014 due to EPA Tier II rule changes.  Reports as appropriate at mid-year and end of calendar year (see below): complete.
	Develop and maintain the TRI/Tier II database.	Ongoing	Database is searchable and maintained.
	Assess SARA fees, generate and mail bills, monitor payments and follow-up with unpaid accounts.	Ongoing	Timely assessment of fees and mailing of bills: see above regarding slight delay.
	Utilize EPA internet-based system for receipt of TRI reports.	Ongoing	Electronic System is in use and 100% of reports are received electronically



	Utilize EPA Tier II Submit software for electronic reporting of Tier II reports.	Ongoing	Electronic System is in use and ~98% of reports are received electronically
Provide information on program internally, and to public and facilities.	Respond to inquiries regarding TRI reporting and payment requirements from Colorado businesses.	Ongoing	Respond in timely manner: Ongoing Number of inquires: Was not tracked
	Respond to inquiries on information to the public and appropriate parties.	Ongoing	Respond in timely manner: Ongoing Participated in CDPHE HEEJ Data Team including SARA (TRI) and other DEHS data sets in HEEJ Viewer.
	Generate chemical inventory reports for electronic transmittal to appropriate parties (LEPCs, CEPC, EPA, HMWMD Records Center, CDPHE OEPR).	Ongoing	Tier II data was distributed mid-year. Other reports at end of calendar year: - complete.
<b>SUSTAINABILITY PROGRAM</b>			
<b>GREENING GOVERNMENT</b>			
<b>Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 3-Objective 3.2: Preserve Land; Goal 4-Objective 4.2: Promote Pollution Prevention</b>			
<b>Subgoals</b>	<b>Objectives</b>	<b>Timeline</b>	<b>Performance Measures</b>
Implement Governor's Greening Government Executive Order.	Participate as a lead agency in implementing Greening Government Executive Order.	FY 2014	The Executive Order has expired and Governor Hickenlooper has indicated he does not intend to issue another. He is still supportive of GG efforts and CDPHE is providing administrative and technical support to the GGLC (see below).
	Attend and participate in regular meetings with other state agencies participating on the Greening Government Leadership Council (GGLC).	FY 2014	The GG Council underwent a strategic planning and reorganization effort in FFY2014. CDPHE is participating in council meetings as well as committee meetings.  # of meetings attended:18

	Identify targets and objectives for annual Greening Government Projects.	FY 2014	The GGLC has drafted goals for state government and is awaiting input from the governor and his cabinet for final approval.
	Implement projects to meet targets and objectives.	FY 2014	CDPHE outcomes from projects include: <ul style="list-style-type: none"> <li>• Fuel savings from replacement fleet vehicles: 1,085 gallons (est.)</li> <li>• Lbs employee e-waste recycled: 12,254</li> <li>• Lbs batteries properly recycled: 890</li> <li>• Gallons of water reduced through toilet &amp; urinal replacements: 874,000 (est.)</li> <li>• kWh reduced through LED retrofits: 1,675/yr</li> </ul>
	Provide assistance to all state agencies.	FY 2014	CDPHE has provided technical assistance to the best management practices subcommittee which serves all state agencies.
	Report on projects and efforts.	FY 2014	We have temporarily discontinued producing an annual report on GG outcomes pending final formation of the GGLC
Encourage, award, and educate on the use of sustainability practices throughout Colorado.	Provide education and training to business, state and local government, and employees on sustainability practices.	Ongoing	# of individuals reached: 355 (through new employee orientation, GGLC and earth day events)

SUSTAINABILITY PROGRAM			
ENVIRONMENTAL LEADERSHIP PROGRAM			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality, Objective 1.3: Restore the Ozone Layer, Objective 1.4: Reduce Unnecessary Exposure to Radiation; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land, Objective 3.3: Restore Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Performance Measures
Identify, recognize and provide incentives to businesses and municipalities that are going beyond basic compliance with environmental requirements and are developing sustainable business practices.	Grow the ELP while maintaining credibility of program and members.	Ongoing	# of member events held: 9 # of members participating: 760
Promote ELP to potential members through marketing and outreach.	Provide ELP outreach to companies, trade associations, etc. including a combination of at least 15 presentations, recruitment meetings and site visits with potential applicants annually.	Ongoing	# of presentations: 24 # of attendees: 121 # of recruitment meetings: 1
	Conduct seminars and/or provide training materials on EMS/ELP/P2/Sustainability to Colorado facilities.	Ongoing	# of presentations: 2 # of attendees: 60 # of entities reached: 60
	Promote ELP programs internally and to local agencies for referrals.	Ongoing	# of referrals from state and local employees: 7  # of contacts with state and local employees: 61  # of new members as a result of internal referral: 7
Provide member services and mentoring	Provide technical assistance and gap analysis for potential ELP members.	Ongoing	# of facilities provided assistance: 3
	Provide EMS trainings, roundtables, workshops and other mentoring opportunities.	Ongoing	# of sessions: 1 # of facilities attending: 20

	Develop and annual ELP progress report.	Annually by December 31 <sup>ST</sup>	Completion and electronic distribution of report
Implement Gold Level ELP.	Expand membership in the Gold Level; enroll a minimum of 2 new participants annually.	Ongoing	# of new applicants: 13 # of EMSs assessed: 3 # of new members: 12
	Expand the recognition elements of the program for the Gold Level annually, including: Contact each ELP member and document successes; place successes on website with members logos	Ongoing	Successes documented and measurements tracked Measurements on internet site # of hits on internet site: 497 (Data only available for July 1 thru September 30, 2014 due to web site migration)
Implement Silver Level ELP.	Conduct mentoring training (EMS) for members.	Ongoing	# of Silver level members applying for Gold Level: 11
	Continue to grow membership in Silver Level; enroll a minimum of 2 new participants in Silver Level annually.	Ongoing	# of new applicants: 11 # of projects assessed: 11 # of new members: 10
Implement Bronze Level ELP.	Continue to grow membership in Bronze Level; enroll a minimum of 5 new participants in Bronze level annually.	Ongoing	# of new applicants: 33 # of EMSs assessed: 0 # of new members: 33
Meet with External ELP Advisory Group.	Leverage through the PPAB and include other ELP members and other stakeholders.	Ongoing	# of recommendations and ideas: 2
Meet with Internal ELP Advisory Group.	Meet with internal staff (as needed) to advise ELP on various elements of the program, including compliance reviews and issues.	Ongoing	# of recommendations and ideas: 10

SUSTAINABILITY PROGRAM			
PARTNERSHIPS			
Supports EPA 2011-2015 Strategic Plan Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land, Objective 3.3: Restore Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Performance Measures
Colorado Environmental Partnership (CEP)	Participate in selecting topics, finding speakers, promoting meetings, etc.	Ongoing	# of collaborative events held: 4
Collaborate with industry, not-for-profits, and governmental agencies in sustainability and energy education including entities such as: -- Federal Govt: R8, NREL, DOE, OPPTS, -- State & Local Partners: PPAB, DOA, Colorado Energy Office, Office of Economic Development, Sustainability Work Group, GGLC. -- NGOs: Product Stewardship Institute, NPPR, SAC, Peaks-to-Prairies, Colorado Sustainable Business Network, EC, ED, Colorado Association for Recycling , ICLEI,CORE, Alliance for Sustainable Colorado. -- Businesses & Assns: CLA, CMA, Colorado Auto Recyclers, Automotive Service Assn, Small Business Assn, Printers and Imaging Assn, Colorado Restaurant Association, Manufacturers Edge formerly Colorado Association for Manufacturing Technology (CAMT).	Continue partnership with Colorado Energy Office, DOE and NREL on energy related projects.	Ongoing	# projects or initiatives resulting from partnerships: none at this time.
	Serve as a board member or active participant in meetings and activities.	Ongoing	Results of efforts include: participation in the planning of the CAFR annual recycling summit.
SUSTAINABILITY PROGRAM			
POLLUTION PREVENTION PROGRAM			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.1: Address Climate Change, Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Performance Measures
Make pollution prevention the environmental management tool of first choice and include sustainability in department decision making.	Integrate pollution prevention concepts and techniques into Greening Government, Cross Media Compliance Assistance, and E3 initiatives to eliminate pollution at the	On-going	Number of initiatives including pollution prevention and/or sustainability:3

	source.		
Garner employee participation in environmental efforts.	Hold CDPHE-wide Cherry Creek Cleanups along the creek designated for CDPHE.	Spring and Fall 2014	64 participants 565 Lbs of trash collected
Participate in Colorado Economy, Energy, Environment (E3) Initiative with Manufacturers Edge (formerly CAMT), CEO and other partners.	Assist in recruitment of businesses/facilities, performing P2 portion of assessments, and follow-up to document implementation and environmental outcomes.	Ongoing	Recruiting led by Manufacturers Edge: supplied TRI and ELP facility lists for use.  E3 assessments participated in: 8 – the initiative on hold until further funding is found.  Environmental Outcomes from recommendations and implementation is reported in EPA SR grant final report.
<b>SUSTAINABILITY PROGRAM</b>			
<b>POLLUTION PREVENTION ADVISORY BOARD</b>			
<b>Supports EPA 2011-2015 Strategic Plan Goal 3-Objective 3.2: Preserve Land; Goal 4-Objective 4.2: Promote Pollution Prevention</b>			
<b>Subgoals</b>	<b>Objectives</b>	<b>Timeline</b>	<b>Performance Measures</b>
Assist the Pollution Prevention Advisory Board (PPAB) in providing the maximum environmental benefit to CDPHE and other stakeholders.	Provide meeting support, as well as support for subcommittee meetings.	Ongoing	Provided agenda, meeting logistics, minutes, and other documentation in a timely manner.
Administer the P2 Grants Program from the P2 Fund.	Assist and support PPAB in grant solicitation, review and selection process.	FY 2014	Selected 5 new grants to support.
	Provide technical assistance to grantees. Track project progress and outcomes.	FY 2014	FY14 PPAB P2 grants resulted in 5.5 million gallons of water reduced.
Assist and support PPAB and the Assistance Committee in implementation of the Recycling Resources Economic Opportunity Grant Program.	Assist in the development of criteria for grants.  Announcement of grant solicitation.  Assist in the application evaluations.	Ongoing	Criteria developed  Grants announced and awarded
	Support grant recipients and track project performance, make project results available to the public.	Ongoing	All projects were completed in a timely manner  Project metrics are tracked internally and are available upon request.

RREO Rebate Program	Assist in the development of criteria for rebates and announce rebate solicitation.	FY 2014	Criteria Developed Rebate application was announced and awarded.
<b>SUSTAINABILITY PROGRAM</b>			
<b>SELF AUDIT LAW</b>			
<b>Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention; Goal 5, Objective 5.1: Enforce Environmental Laws</b>			
<b>Subgoals</b>	<b>Objectives</b>	<b>Timeline</b>	<b>Performance Measures</b>
Maintain the Self-Audit Policy and partner with EPA.	Abide by the Memorandum of Agreement and the EPA Self-Audit Policy.	On-going	# of entities submitting Self-Audit Requests: 17
Maintain internal contacts with each CDPHE division.	Coordinate Self-Audit submittals to appropriate divisions	On-going	# of Closed Self-Audit requests: 1 # of Open Self-Audit requests: 16
Continue to expand, enhance and update the Self-Audit website.	Provide access to information as appropriate	On-going	# of internet hits: N/A
<b>SUSTAINABILITY PROGRAM</b>			
<b>EMS PERMIT PROGRAM</b>			
<b>Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention; Goal 5, Objective 5.1: Enforce Environmental Laws</b>			
<b>Subgoals</b>	<b>Objectives</b>	<b>Timeline</b>	<b>Performance Measures</b>
Educate management and staff on EMS Permit Program.		Ongoing	Upon receipt of an EMS permit request, management and staff will move forward with implementation of the program. In FFY 2014, no formal requests were made.

Integrate EMS Permit Program into environmental divisions.	Determine value of EMS Permit approach versus incentives under the Environmental Leadership Program and other regulatory approaches.	Ongoing	Upon receipt of an EMS permit request, management and staff will move forward with implementation of the program. In FFY 2014, no formal requests were made.
<b>ENVIRONMENTAL AGRICULTURE PROGRAM</b>			
<b>ANIMAL FEEDING OPERATION (CAFO, HCSFOS, AFO) PROGRAMS</b>			
<b>Supports EPA 2011-2015 Strategic Plan Goal 2-Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 5, Objective 5.1: Enforce Environmental Laws</b>			
Subgoals	Objectives	Timeline	Performance Measures
<b>CAFO REGULATIONS</b>  Implement state- water quality regulatory programs specific to animal feeding operations (AFOs), concentrated animal feeding operations (CAFOs) and housed commercial swine feeding operations (HCSFOs) as appropriate.	Improve sector compliance through the development of effective water quality protection regulations that are in compliance with federal and state statutes and rules.	As necessary, update and implement state CAFO regulations to address CAFOs that are impacting water quality, or to reflect changes made to the federal CAFO rule.	Revise applicable state CAFO regulations within one year of the effective date of applicable federal rules.  100% consensus with all stakeholders on proposed regulatory revisions prior to the final state rulemaking hearing before the Colorado Water Quality Control Commission.
<b>CAFO PERMITS</b>  <u>Permit all CAFOs</u> in accordance with applicable federal and state regulatory requirements and deadlines.  <u>Reporting of permitted CAFO data</u> to EPA.	<ul style="list-style-type: none"> <li>• Certify permitted CAFOs under Colorado CAFO general permit no. COA 932000.</li> <li>• Permit any new discharging CAFOs in accordance with applicable federal and state regulations.</li> <li>• Enter all data requirements on permitted CAFOs into ICIS, including the required elements of the approved Nutrient</li> </ul>	<p>On-going</p> <p>Within 180 days of receipt of complete application.</p> <p>Mid Yr by April 30 EOY by Oct. 31</p>	<p># of permitted CAFOs recertified under COA 932000. 13</p> <p># of new CAFOs certified under permit COA 932000. 3</p> <p>% of permitted CAFOs entered into ICIS. 100%</p>



	<p>Management Plan.</p> <ul style="list-style-type: none"> <li>• Participate as appropriate in quarterly meetings with EPA to discuss progress towards meeting annual permitting and enforcement commitments.</li> </ul>	Quarterly, as scheduled	
<p><b>CAFO INSPECTIONS</b></p> <p><u>Conduct CAFO inspections</u> to determine compliance with applicable federal and state regulatory and/or permit requirements.</p> <p><u>Report CAFO inspection information</u> to EPA.</p> <p><u>Submit CAFO Inspection Plan</u> to EPA.</p>	<ul style="list-style-type: none"> <li>• Inspect all permitted CAFOs at least once during the life of the permit, every unpermitted CAFO at least once every five years, and all medium AFOs at least once to determine if it is a medium CAFO.</li> <li>• Complete a minimum of 40 CAFO compliance inspections by the end of each inspection year (i.e., Sept. 30<sup>th</sup>) in accordance with Colorado's Inspection Plan.</li> <li>• Participate in up to four joint/oversight EPA/State CAFO inspections, in addition to any other oversight inspections that may be conducted. (EPA will contact the Ag Program to schedule joint/oversight inspections at facilities identified in the CAFO inspection plan.</li> <li>• Provide electronic copies of all inspection reports and dated cover letters conducted per the state's inspection plan to EPA at the time the inspection is sent to the facility. This shall include inspections that are substituting for a planned inspection.</li> <li>• Enter all permitted CAFO inspections into ICIS.</li> </ul>	<p>Ongoing over rolling five year periods.</p> <p>Sept. 30, 2014</p> <p>w/i 45 days of the inspection</p> <p>Mid Yr by April 30 EOY by Oct.</p>	<p>% of known CAFO universe inspected every five years (at a minimum). 99.6%</p> <p># of CAFOs inspected. 37</p> <p># of medium AFOs inspected. 3</p> <p>% of return to compliance actions completed within established compliance deadline included in the follow up inspection report. 60%</p> <p># and type of [joint/oversight] inspections completed. 4 joint inspections conducted on 3/4/2014 and 3/18/2014.</p> <p>% of reports submitted to EPA within established timeline. 100%</p> <p>% of permitted CAFO inspections entered into ICIS by established</p>



	<p>individual CAFO permits.</p> <ul style="list-style-type: none"> <li>• Report to EPA on the number of inspections completed, inspection status and the status of inspection follow up activities.</li> <li>• Submit an electronic copy of the CAFO inventory to EPA and report on progress made toward inventory development.</li> <li>• Report to EPA on compliance assistance activities, training and presentations provided to the livestock industry.</li> </ul>		<p>effective date of the permit. 100% % of enforcement data entered into ICIS by established deadline. N/A</p> <p>EOY report and CAFO inventory submitted to EPA by the established timeline. EOY inventory submitted to EPA on 12/22/2014.</p>
<b>CROSS-CUTTING ENVIRONMENTAL AGRICULTURE INITIATIVES</b>			
<b>Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 4- Objective 4.2: Promote Pollution Prevention</b>			
<b>Subgoals</b>	<b>Objectives</b>	<b>Timeline</b>	<b>Performance Measures</b>
Coordinate the Agricultural Technical Workgroup.	Review technical environmental data and potential new environmental requirements resulting from agricultural activities to gauge resource needs and potential new priorities.	Ongoing	<p># of meetings held- Leveraged time by using other workgroups (RMNP Ag Subcommittee and NRCS State Tech Committee) Attend 2 STC meetings and present updates</p> <p># of recommendations put forth by the workgroup: As needed.</p>
Coordinate the Rocky Mountain National Park (RMNP) Agricultural Subcommittee.	Coordinate meetings of the subcommittee and interested stakeholders.	Ongoing	# of meetings held – 4 meetings of RMNP Ag Subcommittee (Ave. attendance ~30). Three meetings of work group to develop 5-year plan for Communications (Ave. attendance ~15) and 6 meetings to develop 5-year plan for Monitoring (Ave. attendance ~15). 17 meetings total.

	Develop incentives to promote implementation of ammonia reduction best management practices (BMPs).	Ongoing	# of incentives recommended and/or implemented- Development of Early Warning System Pilot, work with NRCS to fund ammonia reduction practices with EQIP dollars.
	Develop outreach materials to educate agricultural producers and citizens on agriculture's contribution to nitrogen deposition in RMNP.	Sept. 2014	# of outreach materials developed and distributed- three factsheets developed and distributed at various events, display board posters for events produced. Slide presentations posted to RMNP Initiative web site. Early Warning System website completed and available for producers to sign up.
	Work with CSU to field test ammonia BMPs at dairies and feedlots.	Ongoing	# of BMPs field-tested- maintaining relationship with CSU to support efforts to collect ammonia emissions information in ag areas and robotics studies collecting emissions info from edge of field monitoring. Participated in CSU's CLEAN Center kick-off and shared interest in cross media concerns about ammonia in air vs. nutrients in water and BMPS to address them. Reviewed the CSU Dairy Energy Case studies.
	Work with USDA Natural Resources Conservation Service to incorporate ammonia BMPs into technical standards and existing NRCS programs.	Sept. 30, 2014	# of BMPs incorporated into NRCS programs- 19 NRCS practices with potential to reduce ammonia emissions.  # of agricultural producers participating in NRCS programs – not readily available to state. Approximately 35 producers participated in the first year of the Early Warning System Pilot .

	Work with the Air Pollution Control Division to improve Colorado's Ammonia Inventory.	Ongoing	% change in 2002 ammonia data (source contribution) across all sources – Assisted by reviewing emissions inventory information included in the 2012 Milestone Report.
	Seek resources (grants) to support BMP research, outreach, etc.	Ongoing	# of grants applied for and awarded- Early Warning System Grant applied for and awarded. Monitoring funding grant received. Assisted with efforts to obtain EPA grant dollars for monitoring and NRCS for Ag AQ Initiative. Small part in effort to recognize FRAPPE and NASA-DISCOVER air campaigns in CO in August 2014.  # of ammonia-related outcomes of projects- Not yet determined.
	Participate in contingency plan measures, if applicable.	Sept. 30, 2014	# of contingency measures developed and actions taken to implement measures- Contingency Plan not triggered as a result of Milestone Report. Increased outreach planned for next monitoring period.
Serve as lead on NRCS Air Quality Committee	Work to implement recommendations from the crop and livestock sectors into NRCS conservation programs, including air and water quality conservation practices.	Sept. 30, 2014	# of recommendations made to the NRCS State Technical Committee  # of recommendations supported or implemented by NRCS within existing programs- Interacted with 319 Program and Groundwater Programs to share information about RMNP Ag Subcommittee efforts and support NRCS AQ Initiative.
Increase compliance assistance to agriculture sector.	Provide outreach and interpretation to livestock producers on applicable solid waste and industrial waste water requirements.	Ongoing	# of producers seeking assistance on cross-cutting issues (i.e., composting and biofuels, etc.)- Not tracked

	Coordinate communication within environmental divisions on issues impacting agriculture such as biofuel technologies, land application of sludges, composting, etc.	Ongoing	# of multi-media meetings held- 26 related to Environmental Leadership, bioaerosols, energy, nutrients, SPCC, etc.  # of cross-cutting issues resolved- not tracked
	Assist with permitting issues and questions from the agriculture industry on cross-cutting technologies.	Ongoing	# of producers assisted- not tracked
<b>ADDITIONAL ENVIRONMENTAL PROGRAMS</b>			
<b>SMALL BUSINESS OMBUDSMAN</b>			
<b>Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.1: Ensure Chemical safety, Objective 4.2: Promote Pollution Prevention</b>			
Subgoals	Objectives	Timeline	Performance Measures
Represent Colorado at the national and regional level as CDPHE's Small Business Ombudsman.	Serve on the national 507 Steering Committee or SBO/SBAP Subcommittees, including conference calls, and materials related to Colorado's program.	Sept. 30, 2014	# of award nominations reviewed for the national small business meeting- Award subcommittee disbanded.  # of subcommittees participated on- NSC technical steering committee and Annual Meeting Planning for 2015. Attended SBO/SBAP Annual meeting in Washington D.C. in Jun 2014.
Provide assistance and track assistance provided to small business.	Refer small businesses to technical resource in the Small Business Assistance Program (SBAP).  Send small businesses customer assistance rating surveys to gauge SBAP services.	Sept. 30, 2014	# of calls received and referred to SBAP – not specifically tracked as calls referred to SBAP, referred as appropriate for technical advice.  # of surveys sent- 126  Identification of positive trend in survey results compared to past survey data- 100 % rated SBAP good to excellent in overall service provided.
	Provide timely response to small businesses.	Ongoing	# of entities assisted- Approximately 95 calls and ~840 through email.

	Contact trade associations and small business representatives that SBAP has worked with and get comments and feedback.	Ongoing	# of follow-up activities and suggestions sent back to SBAP- Sunset review of CAP through DORA
Serve as a resource for small businesses.	Serve as an impartial resource for small businesses that have complaints or concerns about fair treatment by the environmental divisions.	Ongoing	<p># of times assistance provided to business- 1 request during enforcement action.</p> <p># of contacts made with environmental staff- Participated in AQ/HW Dry cleaner inspector training met with two HW compliance assistance units, present environmental/sustainability presentations at four New Employee Orientations, reviewed AQCD Enforcement Guide</p> <p>Environmental outcomes of assistance efforts – better understanding of small business concerns and connections at the department.</p>
	Review SBAP guidance documents prior to issuance and provide advisory opinions.	Ongoing	# completed - Perc D/C calendar, training outreach doc and presentation
	Provide training and outreach on tools available for small businesses and the assistance available through SBAP.	Ongoing	# of conferences or seminars participated in- west slope AQ training, newcomer training, confidentiality meetings, printing technologies, communication and participation training, database training, oil & gas hearings, TRI webinar,
Review regulations to determine impact on small business and provide information on the regulations to small business community.	Ensure new and modified regulations that impact small businesses are reviewed. Solicit comments from the small business community and through Compliance	Ongoing	<p># of new regulations reviewed- 3</p> <p># of new regulations modified that affect small business</p>

	Advisory Panel (CAP) and submit to EPA.		
	Solicit comments on new small businesses regulations from trade associations and present back to appropriate regulatory agency as small business community comments.	Ongoing	# of comments and suggestions provided within the regulatory timeframe – through NACAA or ACWA or NSC
Support and coordinate the Small Business Compliance Advisory Panel.	Assist in ensuring the Compliance Advisory Panel is an effective resource for small businesses and CDPHE, including assisting the CAP in issuing the advisory report and discuss with EPA.	Ongoing	# CAP meetings held- 3, difficulty filling CAP positions this term.  # of presentations presented to the CAP, including guidance documents, projects and issues for its advisory opinions- ~10  # of recommendations made to the director for appointments after conferring with SBAP- Nine

#### ADDITIONAL ENVIRONMENTAL PROGRAMS

#### ENVIRONMENTAL JUSTICE

**Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land, Objective 3.3: Restore Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention**

Subgoals	Objectives	Timeline	Performance Measures
Serve as the Division of Environmental Health and Sustainability's representative on environmental justice (EJ) issues.	<p>Participate in meetings between DEHS, EPA, and other CDPHE staff and communities, as appropriate.</p> <p>Raise awareness within the DEHS and other CDPHE programs on Health Equity (HE) and EJ issues that affect daily work duties and responsibilities</p> <p>Provide training to DEHS staff of emerging EJ issues as appropriate.</p> <p>Review EJ-related documents/policies and, as necessary, collaborate with DEHS staff on EJ projects or efforts, including obtaining information from EPA website, community newsletters, contacts and provide in meetings or correspondences as</p>	Sept. 30, 2014	<p># of events participated in or DEHS EJ events facilitated and/or coordinated- 8 meetings/events with DEHS staff, 3 screenings, 1 of department data viewer and 2 of EPA's EJSCREEN</p> <p># of other CDPHE HE/EJ meetings attending (not including collaborative) - Lunch learning series, Dragon boat races</p> <p># of events with EPA attended (e.g., Denver EJ Forum, EPA EJ training, etc.) 2 meetings Denver EJ Forum, 2 meetings Western States EJ calls,</p>



	necessary.		# of attendees at CDPHE-HE/EJ trainings or educational opportunities- Unequal/unhealthy conf call Documented environmental outcomes, if available- Not tracked  # of documents/policies reviewed- 9
Participate in the CDPHE Health Equities/Environmental Justice (HE/EJ) Collaborative.	Actively participate in identifying and helping to implement CDPHE's path forward regarding HE and EJ issues.	June 30, 2014	# of meetings attended- Ten Steering Committee meetings, three workforce development as Co-lead, Four Policy meetings, 13 of various sized sub-work groups to incorporate HE/EH into regulatory programs (regs., permitting, inspections, compliance assistance, etc.)
<b>COMPLIANCE ASSISTANCE</b>			
<b>ENVIRONMENTAL HEALTH</b>			
<b>Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention</b>			
<b>Subgoals</b>	<b>Objectives</b>	<b>Timeline</b>	<b>Performance Measures</b>
Provide regulatory oversight to schools in rural areas.	Conduct field inspections and compliance assessments through self-certification of schools in counties without local public health agencies under the jurisdiction of the department.	Ongoing	Percentage of schools with chemical laboratories assessed at least once during the performance period.  100% of schools with chemical laboratories were assessed at least once during the performance period through field inspection or self-certification. An additional 70 high schools with chemical laboratories were also assessed in El Paso and Weld counties by completing self-certifications during the performance period. It is anticipated that 100% of

			schools will be inspected during CDPHE's FY2015.
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REGULATORY UNIFORMITY			
ENVIRONMENTAL HEALTH			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Performance Measures
Provide training and assistance to state and local public health personnel to assure uniformity in regulatory inspections for schools.	Develop an on-line training course for school and regulatory personnel.	FY 2014	<p>Development of on-line training course for local public health agencies.</p> <p>The Rules and Regulations Governing Schools in the State of Colorado are under revision. Therefore, the on-line school training course has been put on hold until the revision process is complete in order to reflect changes made to the regulation.</p>
Provide compliance assistance for schools to that tested above EPA action levels for radon.	Provide technical support and assistance for schools within the department's jurisdiction to identify resources for radon level reduction and mitigation.	FY 2014	<p>Percentage of schools tested during FY 2013 project period with levels below EPA action levels.</p> <p>100% of schools identified as having radon levels above the EPA action level during the initial testing period have completed or are currently conducting follow-up testing using long-term testing methods. To date, 25% of schools that initially tested high report significant reductions in radon to levels below the EPA action level as a result of mitigation efforts made as part of this project, including a school with radon levels initially as high as 30 pCi/L. We are currently assisting the remaining schools with high radon levels with determining available options for mitigation.</p>

### 3.0 Air Pollution Control Division – FY 2014 Work Plan Status and Accomplishments

#### APCD Goal 1: Achieve a level of air quality that protects and preserves human health

Sub-goals include:

- Attain and maintain National Ambient Air Quality Standards
- Protect citizens from exposures to toxic air pollutants

EPA 2011-2015 EPA Strategic Plan Goal 1: Taking Action on Climate Change and Ensuring Air Quality -- Objective 1.2 Improve Air Quality

EPA 2011-2015 Strategic Plan Goal 5, Objective 5.1: Enforce Environmental Laws

Program Strategy	Activity	Milestone/Measure	End of Year Status
<b>MOBILE SOURCE PROGRAMS</b>			
1.1 Operate Automobile Inspection and Readjustment (A.I.R.) Program and Clean Screen Program – Regulation No. 11	Operate A.I.R. program in Denver metro and North Front Range areas.	Ongoing	Program is ongoing and meeting objectives. Over 900,000 vehicles will undergo emissions inspection during the current calendar year. More than 200,000 vehicles will be cleaned screened through the use of on-road remote sensing.
	Ensure that the A.I.R. program in Denver metro and North Front Range areas is consistent with and continues to meet all SIP requirements. North Front Range program is state-only, and not part of the SIP.	Ongoing	The current A.I.R. Program is on track to meet all SIP requirements.
	Inspector training/certification maintained.	Ongoing	Inspector training/certification is continuing in an ongoing basis.
	Data collection and processing systems maintained.	Ongoing	Data collection and processing systems are being satisfactorily maintained.
	Support field enforcement activities by Dept. of Revenue.	Ongoing	Department of Revenue enforcement activities supported. More detail is given in IM annual report.
	Monitor program quality and performance.	Ongoing. Annual report developed each year.	Annual report released in June.

Program Strategy	Activity	Milestone/Measure	End of Year Status
	Provide support to customers, inspectors, auto entities and repair technicians.	Ongoing	Staff, on an ongoing basis, is responding to customer, repair technician, and automotive industry inquiries. Emissions inspectors as well as the state's contractor are being supported. Staff continues to conduct various outreach programs such as "Tech nights".
1.2 Operate Diesel Inspection and Self-certification Program – Regulation No. 12 (State only)	Similar operation and training measures as A.I.R. Program. Work with our counterparts at the regional and local levels to implement the Colorado Clean Diesel Program.	Ongoing	Mobile Sources Program successfully operates and maintains on an on-going basis the State's diesel programs. Implemented "Exemplary maintenance" program as an option for diesel "self-certification" fleets.
1.3 Develop and participate in mobile source air quality improvement strategies	Continue remote sensing activities.	Ongoing	Cleaned screened over 200,000 vehicles this year.
	Implement and continue smoking vehicle programs.	Ongoing	Smoking vehicle hotline maintained.
	Participate in Regional Air Quality Council programs.	Ongoing	Continue to work with the RACQ on an on-going basis.
	Review auditor A.I.R. Program recommendations.	Ongoing Expanding model year exceptions to seven model years. Incorporating On-Board-Diagnostic (OBD) as a component of the IM Program inspection.	Implementing new IM program with expanded vehicle model year exemption periods and the use of OBD testing starting January 1, 2015.
	Conduct public outreach.	Ongoing	Continued current efforts. Gearing up for and getting ready to start public outreach program for new IM program that begins January 1, 2015.
	Submit area-wide assessment of RVP levels as part of Ozone SIP development.	Ongoing	2014 winter and summer gasoline surveys completed along the Front Range.  Summer sample results indicate the 7.8 pound Rvp Denver-North Front Range standard was met by most samples, though most were close to the maximum allowed standard.

Program Strategy	Activity	Milestone/Measure	End of Year Status
			The Southern Front Range (Colorado Springs – Pueblo areas) continues to show large variability in gasoline volatility. Over 30% of gasoline samples met the more stringent 7.8 Rvp Denver area standard, with the rest, meeting the 9.0 Rvp conventional gasoline standards.
	Utilize MOVES model in SIP planning and mobile source air quality assessment activities. Continue participation in model improvement and development activities.	Ongoing	Continue current efforts to use MOVES model in SIP planning and other mobile sources air quality assessment activities, as well as participate in the process to improve the MOVES model.
	Monitor Federal Renewable Fuels Program.	Ongoing	Following latest developments including proposals to lower ethanol requirements.
	Monitor federal new Tier 3 vehicle emissions certification, GHG, and CAFÉ rules. Continue to contrast federal rules to California's LEV program.	Ongoing	On an on-going basis, continue to track and maintain in-house expertise on Tier 3, GHG, and CAFÉ rules, as well as follow California's vehicle certification requirements and standards.
	Examine the use of remote sensing to identify vehicles with high evaporative emissions.	Conducting research.	Data has been given to U.S. EPA for incorporation into the next reversion of the MOVES model. ERG characterized fleet for evaporative emissions based on this remote sensing work.
	Assist NREL with mass emissions testing of vehicles involved in vehicle emissions studies.	Ongoing	NREAL and other federal labs and agencies are continued to be supported. Ethanol fuel test findings have been published in peer reviewed journals such as ACS's journal of Environmental Science and Technology, as well as being used by the EPA in the recent Tier 3 rule.
1.4	Provide mobile source emission inventories and emission factors.	Ongoing	Emission inventories and emission factors continue to be routinely

Program Strategy	Activity	Milestone/Measure	End of Year Status
Support mobile source strategies through technical studies and operation of testing equipment and facilities			developed.
	Operate and maintain Technical Centers.	Ongoing	Tech Centers continue to be operated and maintained on an on-going basis. Upgrades to the stations, such as additional 4-wheel drive dynos, have been conducted in support of current and new IM programs.
	Operate and maintain mass emissions testing facility.	Ongoing	Mass emissions testing facility continues to be operated and maintained in support of mobile source program requirements. New controller assembly for lab dynamometer installed.
	Conduct an analysis of Colorado fuel market including: volatility, ethanol content, market status and other parameters	Ongoing	Analyzes of 2014 winter and summer gasolines in the Front Range have been completed.
	Contribute to division inventory report of actual annual emission data.	Ongoing	Ongoing
<b>STATIONARY SOURCE PROGRAMS</b>			
1.5 Conduct activities of the Construction Permits Program for stationary sources	Issue permits to minor sources in Colorado.	4,100 minor source permits issued	3,864 minor source permits issued.
	Issue synthetic minor permits to applicable sources in Colorado.	400 synthetic minor permits issued	346 synthetic minor source permits issued.
	Issue PSD permits.	4 PSD permits issued	2 PSD permits were issued.
	Issue permits to major sources in nonattainment areas.	1 NAA NSR permit issued	No NAA NSR permits were issued.
	Enter RACT/BACT/LAER determinations in EPA's clearinghouse database (RBLC) within 30 days following permit issuance, including the "application acceptance date" and "date of permit issuance."	Data entered on a continuing basis	RBLC entries were made on an ongoing basis. APCD also reviewed the RBLC database and added/revised previous Colorado entries that appeared to be missing or incomplete.
	Prepare AIRS data entry and forward to Inventory Group.	Ongoing	AIRS data prepared and forwarded to Inventory Group on an ongoing basis.
	Track PSD increment periodically to meet the requirement of 40 CFR 51.166(a)(4).	Ongoing	PSD increment periodically tracked on an ongoing basis.
1.6 Conduct activities of the Operating Permits Program	Ensure sources submit Title V applications for renewal.	Monitored throughout the year.	Ensured that subject sources submitted Title V applications. Worked with these subject sources through both the permitting and field

<b>Program Strategy</b>	<b>Activity</b>	<b>Milestone/Measure</b>	<b>End of Year Status</b>
for stationary sources			inspection programs.
	Prepare AIRS data entry and forward to Inventory Group.	Ongoing	AIRS data prepared and forwarded to Inventory Group on an ongoing basis.
	Continue development of program with EPA guidance (Part 70) and input from affected parties.	NA	Program development continues on an ongoing basis consistent with EPA guidance and informed by input from affected parties.
	Continue to issue proposed, initial, renewal, and modified Title V permits.	Ongoing	Issued proposed, initial, renewal, and modified Title V permits.
	Prepare and submit TOPS data to the Region for entry into EPA's national database.	Ongoing	Prepared and submitted TOPS data to EPA Region 8 for entry into national database.
	Address recordkeeping and information request requirements.	Ongoing	Recordkeeping requirements addressed through Title V permits and information requests are responded to on an ongoing basis.
	Coordinate with EPA on petitions for Title V permits.	Ongoing	Coordinated with EPA on Title V permit petitions for Colorado sources and responded to EPA orders as appropriate.
1.7 Operate Small Business Assistance Program	Conduct industry workshops, data collection and coordination.	Ongoing	Held 8 workshops for ~360 participants.
	Support Compliance Advisory Panel	Ongoing	Attended quarterly meetings and supported CAP Sunset Review process.
	Update small businesses through site visits and technical assistance (MOU with Field Services Unit).	Site visits performed when requested by business, Field Services, or others.	Conducted site visits and provided technical assistance to small businesses on an ongoing basis.
	Provide consultations and site visits in accordance with MOU with Field Services Unit on enforcement referrals.	Site visits performed when requested by business, Field Services, or others.	Conducted site visits and provided consultation to small businesses on enforcement referrals on an ongoing basis.
	Outreach and coordination with local health departments.	Ongoing.	Local health departments invited to workshops and trainings for engineers and inspectors.
	Participate in Cross Media Innovation and Strategy Team – sector projects and coordination.	Ongoing	Attended meetings; supporting dry cleaner, area source boiler projects.



Program Strategy	Activity	Milestone/Measure	End of Year Status
	Develop End-of-year report on compliance assistance efforts	Ongoing – Report developed annually	Annual Report submitted to EPA as required.
<b>Stationary Sources Program Enforcement:</b>			
1.8 Develop regulations and strategies to support compliance with regulations	Continue to evaluate methods to incorporate P2 into regulations and permits.	Ongoing	Methods for including P2 into regulations and permits are reviewed on an ongoing basis, during individual rulemakings and regulatory reviews.
	Provide support and training to engineers and inspectors (policy interpretation, settlement documents, assist in negotiation of settlements, enforcement data base).	Ongoing	Support and training for engineers and inspectors is provided on an ongoing basis.
	Revise NSR and PSD revisions as needed.	Ongoing	Revisions were made to Regulation 3 to maintain consistency with NSR and PSD.
	Revise Reg. 6 – New Source Performance Standards.	Annual - Ongoing	Regulation 6 was to maintain consistency with federal NSPS, on an ongoing basis.
	Revise Reg. No. 8 Parts A & E incorporating MACT and NESHAP rulemaking updates and development of cooperative federal/state work plan. To include: funding options; addressing 112(j) compliance deadlines; development and implementation of area source rules; development of information; incorporation of pollution prevention where appropriate; and analyses regarding air toxics.	Annual - Ongoing	Regulation 8, Parts A & E was updated to maintain consistency with federal NESHAP on an on-going basis.
	Revise Common Provisions, Regulation 1, Regulation 3, Regulation 4, Regulation 7 regulations to maintain an updated SIP or in respond to EPA SIP disapproval actions.	Ongoing	No revisions were made to the Common Provisions, Regulations, 1, 4 or 7 to update SIP provisions. Regulation 7's state-only provisions were updated. Regulation 3 was revised to update SIP provisions.
1.9 Continue oversight of local health department contracts and inspections (Field Services)	Negotiate contracts annually.	Field Services local agency contracts follow the state fiscal year (July 1 through June 30).	Contracts for State FY14-15 were in place on April 24, 2014
1.10	Inspection review, assistance as needed, enter	Field Services activities ongoing;	Inspections tracking, local agency

Program Strategy	Activity	Milestone/Measure	End of Year Status
<p>Conduct compliance inspections and evaluations for industrial sources (major and minor) and final approval inspections.</p> <p>Report information to EPA through the Air Facility System (AFS).</p>	reports on AFS, maintain tracking logs, monitor quarterly reports.	reports are reviewed and entered into AFS as they are received, assistance is provided to local agencies as needed and upon request, monthly and quarterly reports are maintained to track local agency activity per contracts	assistance and tracking of local agency efforts per contract are performed on an ongoing basis
	Ensure proper certifications (odor & opacity) in place for local agency staff.	Contracts require agency staff attend and obtain opacity and odor certifications. Division does periodic spot checks of certification status.	Division conducts periodic checks to ensure agency staff maintain opacity and odor certifications
	Operating and other final permits reviewed.	Ongoing	Permits are reviewed on an ongoing basis
	Conduct final approval inspections for facilities.	Ongoing; Sources are required to submit a "self-certification" for compliance with initial approval permits; Division reviews all of the required documents before approving the permit for "final approval"	Division reviews documentation for final approval on an ongoing basis
	Perform stack testing, source audits and CEM certifications.	Ongoing Number of stack tests Number of relative accuracy test audits	663 stack tests were conducted 105 RATAs were completed
	Evaluate excess emission reports.	EERs are submitted on a quarterly basis and are reviewed in detail following submittal.	EERs are reviewed in detail on a quarterly basis
	Perform oversight of underground tank inspections by Oil and Gas Division in Denver metro area.	Ongoing Number of oversight inspections	500 oversight inspections were completed
	Provide AFS updates as necessary through:	AFS updated approximately once per month, including all of the MDRs on all sources; all CMS sources are flagged in AFS and HPVs are correctly identified; Division conducts periodic reviews to ensure data is correct	AFS was updated at least once per month through early October 2014. EPA shut down AFS at this time and commenced use of the new database, ICIS-Air. Colorado is currently revising our database, CACTIS, and the communication node in order to report MDRS to ICIS-Air. In the interim, all required data is regularly updated and maintained in CACTIS.
	1. Provide timely data to AFS as identified in the National Minimum Data Requirements	Ongoing	Division tracks all MDRs, plus additional information in CACTIS and

Program Strategy	Activity	Milestone/Measure	End of Year Status
	(MDR's) on CMS sources evaluated or investigated, and on any other sources that are major according to CAA definition.		was reporting to AFS at least monthly. Data is quality assured on an ongoing basis. As noted above, Colorado is revising our database and communication node to interact with EPA's new ICIS-Air database. In the interim, all required data is regularly updated and maintained in CACTIS.
	2. Coordinate with EPA to ensure that CMS sources are flagged in AFS for inspection, and to ensure that high priority violations are correctly identified in AFS.		Division ensures that all CMS sources are properly flagged in AFS for inspection and flags any high priority violations in AFS as required.
	3. Perform periodic reviews of AFS data to ensure required data have been entered correctly.		Division conducts periodic quality assurance reviews of the data.
	Participate in Cross Media Innovation and Strategy Team	Ongoing	Participated in Cross Media Innovation and Strategy Team on an ongoing basis.
	Submit Compliance Monitoring Strategy to EPA	Submitted to EPA by September 30 of each year for the EPA fiscal year beginning on October 1.	CMS Plan for EPA FY15 was submitted to EPA Region 8 on September 30, 2014
1.11 Conduct residential burning emissions control program	Participate in High Pollution Advisory Program in Denver metro area.	Ongoing. Daily air quality "Action Day" forecasts are issued from November 1 to March 31.	Participated in High Pollution Advisory Program in Denver metro area and issued forecasts on an ongoing basis.
	Respond to and follow up on complaints.	Complaints are investigated as they are received.	Complaints investigations are conducted on an ongoing basis
	Coordinate with WESTAR and EPA in identifying PM2.5 and HAP emission contributions from minor source wood boilers and identifying possible control measures if necessary.	Division participates in workshops, trainings and discussions regarding wood boilers.	Continued to track wood boiler issues and participated in discussions on this subject.
	Issue warning letters, compliance advisories, NOVs and compliance orders. Conduct AQCC hearings and Settlement Agreements (both state and local agencies)	Ongoing	Enforcement activities for residential burning violations are performed as appropriate and on an ongoing basis
1.12 Conduct general open burning program	Issue open burning permits and coordinate enforcement against illegal burning and open burning bans.	Ongoing	Open burning permits are issued based on applications received, and per the requirements of Reg 9, on an ongoing basis

Program Strategy	Activity	Milestone/Measure	End of Year Status
1.13 Conduct testing and evaluation of industrial sources	Maintain emissions and facility data system from new, revised and renewed APENs into data system.	Ongoing	We are have recently uploaded the latest emission and facility data to EPA.
1.14 Operate stationary source emissions and facility data system	Utilize the Exchange Network to transfer the Emissions Inventory System information.	Ongoing	The Exchange Network was utilized to transfer emission information.
	Participate in ongoing training provided on National Emission Inventory.	Ongoing	Complete
1.15 Monitor local SIP commitments – Reg. No. 16 street sanding	Monitoring and assessing community SIP sanding reduction activities and reports.	Ongoing	Local SIP sanding reduction activities and reports were assessed for 2014.
<b>INDOOR ENVIRONMENT PROGRAM</b>			
1.16 Reduce asbestos exposure to the public through operation of the Asbestos Program	Conduct 200 inspections for compliance with Regulation No. 8 and NESHAP.	Ongoing Number of inspections completed	The Asbestos Program conducted 577 inspections
	Review notifications; issue abatement and demolition permits.	Ongoing Number of demolition permits issued Number of abatement permits issued	2589 demolition permits issued 5248 abatement permits issued
	Process certification applications; issue certifications.	Ongoing Number of certifications reviewed and processed for Workers, Supervisors, Building Inspectors, Management Planners, Project Designers, Air Monitoring Specialists and General Abatement Contractors. Number of registrations reviewed and processed for asbestos laboratories, training providers and asbestos consulting firms.	Certifications processed: 1018 Worker 55s Supervisor 52 Supervisor/PD 120 Project Designer 637 Building Inspector 113 Insp/management Planner 210 AMS 126 GAC 43 Laboratories 13 Training Providers 179 Consulting Firms
	Initiate enforcement actions; timely and appropriate resolution of cases.	Ongoing Number of non-school cases opened Number of non-school cases closed Number of school cases opened	16 new non-school cases opened this fiscal year 33 old non-school cases closed during this fiscal year

Program Strategy	Activity	Milestone/Measure	End of Year Status
		Number of school cases closed	28 new school cases opened this fiscal year 46 old school cases close during this fiscal year
	Conduct outreach activities.	Ongoing Number of outreach activities conducted	The Asbestos Unit conducted 15 outreach activities.
	Incorporate asbestos enforcement requirements in local health department contracts.	The Asbestos Unit currently has contracts with three local health departments to perform asbestos inspections.	The Asbestos Unit continues to contract with three local health departments and has had conversations with other local departments about expanding this program.
	Conduct Rulemaking, as necessary.	The Asbestos Unit will be undertaking a revision to Colorado Reg. No. 8 during the 2014 federal fiscal year.	The Asbestos Unit did not undertake revisions to Colorado Regulation NO. 8, Part B this year but anticipates beginning revision activities in the current fiscal year.
	Enter data into a database for all asbestos NESHAP notifications and enforcement actions.	Data for all abatement, demolition, certification and enforcement actions is entered into the database on an ongoing basis.	All pertinent data has been entered into the database. The unit is continuing to work on updating its system and hopes to someday offer on-line permitting and certification.
	Implement the TSCA Asbestos-in-Schools Program according to federal and state rules.	The Asbestos Unit continues to implement the TSCA Program, assisting schools to manage asbestos in their buildings. Activities include inspections, being available as a resource for school personnel and responding to complaints. All grant related reports were filed with EPA in a timely manner.	The Asbestos Unit continues to support schools so that they can achieve compliance with the AHERA regulation. The unit has developed an interactive program to provide the required 2-hour awareness training. All grant related reports were filed with the EPA in a timely manner.
1.17 Reduce occurrences of asbestos in schools (CDPHE will implement activities as described in work plan narrative)	Conduct 48 TSCA/AHERA inspections.	Ongoing Number of inspections conducted Number of course audits conducted	The Asbestos Unit conducted 49 inspections. The Asbestos Unit conducted 29 course audits.

Program Strategy	Activity	Milestone/Measure	End of Year Status
1.18 Operation of lead-based paint certification and abatement program.	Conduct 20 inspections for compliance with Regulation No. 19.	Ongoing: Number of inspections conducted	27
	Process Certification applications, issue certifications.	Ongoing: Number of certifications processed and issued.	156
	Conduct course audits	Ongoing: Number of audits conducted	3
	Initiate enforcement actions, timely and appropriate resolution of cases.	Ongoing: Number of actions initiated, Number of resolved	1
	Distribute educational materials.	Ongoing	Distributed educational materials during National Childhood Lead Poisoning Prevention Week 2013 and throughout the winter.
	<i>Partner</i> with local health departments. Partner with state and local housing agencies.	Ongoing	Partnered with Colorado Lead Coalition on various projects.
	Conduct Rulemaking as necessary.	As needed, if EPA changes their clearance levels.	No action FFY 2014.
<b>PLANNING AND POLICY – SIP DEVELOPMENT, REGIONAL COLLABORATION, EMERGING ISSUES, COMMUNITY RELATIONS AND COMMUNICATIONS</b>			
1.19 Develop and implement community based air quality programs in cooperation with local agencies or local governments	Monitor Natural Events Action Plans and other community initiatives in San Luis Valley, Lamar (to support maintenance SIP) and Grand Valley – Grand Junction area.	Ongoing,	Ongoing. Lamar NEAP complete.
	Coordinate and expand Western Colorado Regional Air Quality Collaboration, a voluntary community partnership to promote consistency and collaboration regarding air quality issues.	Ongoing	Ongoing. Partnership now includes 28 counties and 2 municipalities.
	Provide assistance to Garfield County community-based initiative to address natural gas development concerns.	Ongoing	Complete. Ongoing as part of the Western Regional Air Quality Collaboration.
	Work to Identify other at risk areas through monitoring or other methods.	Ongoing	Ongoing
	Respond to citizen concerns and inquiries regarding Colorado's air quality and air pollution control strategies	Ongoing	Ongoing
1.20 Develop and/or revise	Assist the Regional Air Quality Council in evaluating the effectiveness of the 2008 Ozone Action Plan in meeting the 2008 ozone	Implement voluntary ozone control measures if necessary to meet 2008 ozone standard.	No voluntary measures identified. State completed an oil and gas rulemaking in February 2014 that requires more

<b>Program Strategy</b>	<b>Activity</b>	<b>Milestone/Measure</b>	<b>End of Year Status</b>
maintenance SIPs and redesignation requests for current nonattainment and attainment/maintenance areas in Colorado	NAAQS.		stringent controls.
	Develop update to Lamar PM10 maintenance plan.	Submitted to EPA in 2013.	Complete
	Update Lamar Natural Events Action Plan, which is an element of the Lamar PM10 maintenance plan.	Submitted to EPA in 2013.	Complete
1.21 Develop and submit recommended NAAQS designations, as needed	Follow federal NAAQS revision process and prepare recommended designations to submit to EPA as needed.	Submit PM2.5 NAAQS designation recommendations for revised annual standard to Air Quality Control Commission for action in fall 2013. Submit to EPA in late 2013.	Complete
1.22 Develop and submit Infrastructure SIPs	Develop and submit 2010 NO2 NAAQS infrastructure SIP/certification.	Ongoing. Submit in 2013.	Complete
	Develop and submit 2010 SO2 NAAQS infrastructure SIP/certification.	Ongoing. Submit in 2013.	Complete
	Develop and submit 2008 Ozone NAAQS infrastructure SIP/certification.	Ongoing.	Complete
1.23 Develop and submit Interstate Transport SIPs	Prepare 2010 NO2 NAAQS Interstate Transport SIP.	Submit SIP to Air Quality Control Commission for proposed adoption in 2013/14.	Will complete a timely submittal upon receipt of EPA guidance.
	Prepare 2010 SO2 NAAQS Interstate Transport SIP.	Submit SIP to Air Quality Control Commission for proposed adoption in 2013/14.	Will complete a timely submittal upon receipt of EPA guidance.
1.24 Monitor transportation conformity determinations of MPO and CDOT programs and projects – Regulation No. 10	Monitor conformity determinations for Metropolitan Planning Organizations (MPOs) along Front Range.	Ongoing	Ongoing
1.25 Support NEPA activities including review of air quality impacts disclosed in NEPA documents	Review and comment on documents/letters prepared for NEPA process such as Environmental Impact Statements and Resource Management Plans.	Ongoing	Ongoing. 6 NEPA reviews conducted during 2013.
1.26 Conduct Regional Modeling for ozone and other	Continue review National Air Toxics Assessments data and comment on proposed rules and policy.	Ongoing	Ongoing

Program Strategy	Activity	Milestone/Measure	End of Year Status
purposes			
1.27 Operate General Air Toxics Program	Work with other Division programs to seek funding for additional monitoring and grant funding (such as DERA grants).	Ongoing	Ongoing
	Complete additional diesel school bus retrofits contingent upon receipt of DERA funds.	Ongoing	Approximately 100 diesel bus retrofits completed in 2014 with one or more emissions reduction components.
	Improve oil and gas related emission inventories with additional focus on diesel truck traffic.	Ongoing	Ongoing
	Continue implementation of mercury reduction initiatives within CDPHE and assist in development of Mercury TMDL. Analyze mercury reductions since implementation of 2007 Colorado Mercury Rule.	Ongoing	Ongoing
1.28 Implement cross-media initiatives	Continue coordination with other CDPHE programs in development and implementation of: Cross Media Programs, and Environmental Coordinating Committee.	Ongoing	Ongoing
<b>TECHNICAL SERVICES PROGRAM -- MONITORING, EMISSION INVENTORIES, MODELING, PRESCRIBED FIRE</b>			
1.29 Monitor Air Quality	Per CFR Schedule, submit all ambient criteria pollutant data to the Air Quality System (AQS).	Ongoing	Ongoing
	Per the Exchange Network requirements for regulatory and national system reporting, submit XML-formatted AQS data.	NEIEN grant participation is ongoing.	Ongoing
	Implement ambient air monitoring program in accordance with 40 CFR Part 58.	Ongoing	Ongoing
	Submit five-year Network Assessment.	N/A this year. Last submitted by July 1, 2010 deadline.	Work is underway for submission due by 7/1/2015.
	Submit annual SLAMS data certification.	May 1 each year	Completed. Submitted 4/30/2014.
	Operate and maintain monitoring sites statewide (gaseous, particulate, meteorology). Perform daily, weekly, monthly, quarterly, and semi-annual inspections, cleaning, and preventive maintenance per SOP schedules.	Ongoing	Ongoing



Program Strategy	Activity	Milestone/Measure	End of Year Status
	Perform manual bi-weekly precision tests.		
	Conduct required lead monitoring at Centennial Airport.	Ongoing Evaluation and discussion with EPA in 2013-2014 to assess the need for continuation	Ongoing. Site scheduled to shut down 12/31/2014, pending EPA approval.
	Provide updates to department-wide Quality Assurance Management Plan (QMP) and submit to EPA as needed.	Completed in 2011. Updates as needed.	Ongoing
	Revise Quality Assurance Project Plan (QAPP) and submit to EPA.	Ongoing/revisions in progress, to be completed in early 2014.	Development of completely new QAPP is underway, to be completed in spring 2015.
	Operate ambient air monitoring network in accordance with QAPP.	Ongoing	Ongoing
	Modify and update EPA AQS System.	Ongoing	Ongoing
	Produce Annual Air Quality Data Report.	Ongoing	Ongoing. 2013 Data Report published in December 2014.
	QA / QC Review.	Ongoing	Ongoing
	Submit Annual Network Plan to EPA that is oriented toward the new National Air Monitoring Strategy guidance. Review site files.	July 1 each year	Completed. 2014 Network Plan submitted to EPA on 7/1/2014 after 30-day public comment period.
	Conduct daily forecasting, summer and winter pollution advisories, and prepare High Pollution Advisory Season and Summer Ozone Advisory Statistics.	Ongoing	Ongoing
	Continue Emergency Response Forecasting and Support to CDPHE Emergency Response Planning.	Ongoing	Ongoing
	Continue NCore monitoring station as approved by EPA.	Ongoing	Ongoing
	Maintain awareness of requirements for monitoring for new NAAQS. Install sites as needed to meet requirements.	Ongoing. Second near-road NO2 site in Denver will be installed in 2014, to be operational by 1/1/2015. PM2.5 at near-road site by 1/1/2015.	Ongoing. Work on installing the second near-roadway site is underway, pending final site approval from EPA. Completed. PM2.5 is operational at first

Program Strategy	Activity	Milestone/Measure	End of Year Status
			near-roadway site, with the first sample taken on 1/8/2014.
	Maintain awareness of new requirements for Exceptional Events. Flag data in AQS related to natural and exceptional events. Develop and submit documentation to EPA.	Ongoing. Development and submittal of exceptional event documents is ongoing.	Ongoing. Exceptional events for PM and O3 are being flagged in AQS as needed. PM10 events continue to be developed to meet timeframes. An accelerated process is underway for Lamar events to meet SIP Maintenance Plan update timelines.
	Conduct Special Monitoring Projects.	As needed. Ozone precursor/NMOC sites ongoing in Denver/Weld county area. North Front Range Emissions and Dispersion Study to commence in 2013.	Ongoing. Ozone precursor/NMOC monitoring is continuing. The NFR Emissions and Dispersion Study is approx. one-half complete. The summer 2014 filed portions of the FRAPPE and DISCOVER-AQ projects were completed, with data validation now underway.
	Continue National Air Toxics Trends monitoring site in Grand Junction: Maintain and repair VOC/carbonyl, PAH and PM10/metals monitoring equipment. Install and maintain additional equipment as required. Perform calibrations and audits on the equipment. Interpret and report data received from the analytical lab. Submit metals data to AQS within 90 days after the end of each quarter. Provide quarterly analysis updates. Perform monitoring according to the NATTS QAPP. Review and Update QAPP as necessary.	Ongoing.	Ongoing. A laboratory switch for the metals analysis was made from CDPHE to ERG. A new QAPP is under final review. Reports for 2009 to 2012 have been developed and published.
	Assist local agencies in special monitoring studies.	Ongoing. Work on a locally supported source air toxics study targeted at development activities in Garfield County is underway.	Ongoing. Garfield County Emissions and Dispersion Study is approx. one-half complete. Work with Aspen/Pitkin County has taken place to assist them with restarting their O3 monitor and to

Program Strategy	Activity	Milestone/Measure	End of Year Status
			obtain a new continuous PM monitor.
1.30 Develop and Maintain Emissions Inventories	Provide updated emission inventory reports using new EIS system for point, nonpoint and mobile sources (type B) using 2011 and newer emission data and based on the EPA- established reporting thresholds for SOX, NOX, VOC, PM2.5 and PM10, CO, Pb and NH3.	Ongoing	Ongoing
	Develop of an Integrated Approach / Methodology for Inventory Development.	Ongoing	Ongoing
	Support inventory development for state SIPs including Ozone SIP.	Ongoing	Ongoing
	Continue work on the 3-state pilot program: monitoring, emissions/data warehouse (as identified in the "2010 Three-State Pilot Project: Air Monitoring Site Installation and Operation, Emissions Inventory Data Warehouse Development – Colorado Workplan and Budget"), and modeling (as funding is available).	Ongoing. Ozone/meteorological site near Maybell is operational. Development of the Data Warehouse is underway.	Ongoing. Lay Peak/Maybell site will shut down on 12/31/2014 and will be moved to a new location west of Elk Springs in early 2015, per Steering Committee decision. A new O3 site in Paradox is being established. Data Warehouse development and modeling is continuing.
1.31 Conduct Air Quality Modeling	Conduct modeling for stationary source permits.	Ongoing	Ongoing
	Conduct regional modeling for ozone and other purposes.	Ongoing	Ongoing
	Conduct modeling for state SIPS as needed.	Ongoing	Ongoing
1.32 Conduct Prescribed Fire Program	Implement prescribed fire program (develop MOU and issue permits for significant users of prescribed fire through implementation of state-only program through Reg. No. 9: Open Burning, Prescribed Fire and Permitting.)	Ongoing	Ongoing
	Conduct oversight to ensure that permittees implement best air quality protection practices in prescribed burning events.	Ongoing	Ongoing

<b>Program Strategy</b>	<b>Activity</b>	<b>Milestone/Measure</b>	<b>End of Year Status</b>
	Implement local delegation component of program.	Ongoing	Ongoing
	Continue evaluating and implementing recommendations from report developed by HB-09-1199 mandate to review and evaluate Smoke Management Program. Recommendations focus on improved and simplified permitting, communications, monitoring and observation of fires and smoke, resource identification and data analysis.	Ongoing Some recommendations have been implemented and standard conditions relaxed. Work towards some pilot burns is underway.	Ongoing A request for Pilot Projects has been issued. The USFS Tunnel Hill Pilot Project is in the second year. Evaluation of conditions to relax is continuing.

## APCD Goal 2: Achieve levels of air quality in Colorado that protect the integrity of the natural ecosystem

APCD Sub-goals include:

- Protect environment from acid deposition damage - Ensure all Class I areas are protected from acid deposition impacts and other Air Quality Related Values are protected.
- Protect stratospheric ozone – Ensure the control of CFC compounds.
- Take action on climate change – Ensure greenhouse gas emissions are managed.
- Protect environment from Mercury contamination.

### EPA 2011-2015 EPA Strategic Plan Goal 1: Taking Action on Climate Change and Ensuring Air Quality:

#### EPA Objective 1.1 Address Climate Change

#### EPA Objective 1.2 Improve Air Quality

#### EPA Objective 1.3 Restore the Ozone Layer

Program Strategy	Activity	Milestone/Measures	End of Year Status
2.1 Ensure acid rain minimized through operation of construction and operating permit programs	Issued permits to utilities.	Ongoing	Construction and operating permits issued to subject utilities consistent with the requirements of the acid rain program.
2.2 Ensure acid deposition emissions are minimized through testing and evaluation of industrial sources	Conduct stack testing, source audits and CEM certifications for utilities.	Ongoing	Conducted stack tests, source audits and CEM certifications for utilities on an ongoing basis.
	Evaluate excess emission reports for utilities	Ongoing	Evaluated excess emission reports for utilities on an ongoing basis.
2.3 Ensure acid rain minimized through updates to Regulation No.18 as necessary	Revise regulation.	Ongoing	No revisions needed in 2014.
2.4 Reduce nitrogen deposition through implementation of Rocky Mountain National Park Initiative	Annually assess monitoring/research data.	Ongoing	Ongoing
	Work with agricultural stakeholders to develop studies, projects, and Best Management Practices to reduce ammonia emissions	Ongoing	Implemented Early Warning system (EWS) Pilot Project.
	Develop improved ammonia inventory.	Ongoing	Ongoing

Program Strategy	Activity	Milestone/Measures	End of Year Status
	Focus additional attention to RMNP in regard to AQRV impairment.	Ongoing	Ongoing
	Publish Weight of the Evidence Milestone Report to demonstrate if the 2012 milestone was met.	Will be issued by the end of 2013.	Issued June 2014. Commitment to issue next Milestone Report for 2017 milestone.
2.5 Protect stratospheric ozone levels through minimizing emissions of CFCs from applicable sources	Equipment registration and facility notification.	Number of equipment items registered, Number of facility notifications	3998 1950
	Inspections (both state and local agencies) for compliance with Regulation No. 15.	Number of inspections conducted	1238
	Training and outreach (including pollution prevention).	Ongoing	Providing training for new county inspectors as needed and refresher training per request.
	Continue to negotiate local health department contracts annually for CFC inspections and enforcement.	Ongoing	Contracts for the current 7 counties are ongoing; possibility of initiating new contract with West Central Public Health Partnership.
2.6 Ensure man-made climate change impacts minimized	Develop policies and regulations as needed to implement the federal GHG reporting and tailoring rules.	Policies and/or regulations developed to allow state implementation of the federal GHG reporting and tailoring rules as necessary or directed by EPA.	As needed.
	Issue Title V and PSD permits for GHG as provided in tailoring rule.	Ongoing	Issued Title V and PSD permits for GHGs in accordance with the tailoring rule and the June 2014 Supreme Court ruling.
	Monitor and evaluate reduction strategies.	Ongoing	Ongoing
	Monitor legislative activity locally and nationally.	Ongoing	Ongoing
	Continue to coordinate with efforts to implement Governor's Climate Change Initiative and greening Government Executive Order	Ongoing	Ongoing

Program Strategy	Activity	Milestone/Measures	End of Year Status
	Continue to coordinate with efforts to implement Governor's Climate Action Plan.	Ongoing	Ongoing
2.7 Reduce mercury pollution through Colorado Mercury Initiative cross-media programs	CDPHE Strategic Programming process (see discussion in Chapter 2 of PPA). Assist the Water Division development of Mercury TMDLs and ongoing assessment of emissions and deposition.	Ongoing	Ongoing, as needed. Provided mercury data for 2014 statewide health assessment.

**APCD Goal 3: Achieve a level of ambient air quality that protects and preserves standards for visibility and aesthetic concerns for pollutants that cause odors**

APCD Sub-goals include:

- Improve Urban Visibility (Denver AIR Program Area and Fort Collins) – Ensure a decrease in the number of days the Colorado Visibility Standard is exceeded in the areas of applicability
- Reduce Regional Haze (for National Parks and Class I Wilderness areas) – Ensure natural background visibility conditions in all Mandatory Class I Areas by 2064 through the development and implementation of the Colorado Regional Haze SIP
- Control Odors

**EPA 2011-2015 EPA Strategic Plan Goal 1: Taking Action on Climate Change and Improving Air Quality -- Objective 1.2 Improve Air Quality**

Program objective	Activity	Milestone/Measure	End of Year Status
3.1 Reduce pollutants causing haze through the operation of mobile source strategies: Reg. No. 11 – A.I.R. Program Reg. No 12 – Diesel Inspection Smoking vehicles Clean fuels	Described earlier in work plan.	Described earlier  Contributed to CDOT/Colorado Energy Office's "Energy Smart Transportation Committee" efforts to promote clean fuels and vehicles, such as CNG and electric vehicles.	Mobile source programs and activities continue as described previously.



Program objective	Activity	Milestone/Measure	End of Year Status
3.2 Reduce pollutants causing haze through the operation of the stationary sources program objectives Operation of Construction and Operating Permit Programs Small Business Assistance Program Compliance monitoring and enforcement of stationary sources Wood burning Control Program – High Pollution Advisory Program and state and local woodstove regulations	Described earlier in work plan.	Described earlier	Described earlier.
3.3 Support reduction of haze-causing pollutants through regulation updates	Described earlier in work plan.	Described earlier	Described earlier.
3.4 Track program indicators through urban haze monitoring, inventories and modeling	Operate visibility monitoring network in Denver and Fort Collins (transmissometers, nephelometers and Denver web camera).	Ongoing	Ongoing
	Air quality “Action Day” forecasts year-round	Ongoing	Ongoing
	Conduct sample speciation and chemical mass balance modeling	Ongoing Supports exceptional event technical documents.	Ongoing
	Perform daily, weekly, monthly, quarterly, and semi-annual inspections, cleaning, and preventive maintenance per SOP schedules. Perform manual bi-weekly precision tests.	Ongoing	Ongoing
	Operate and maintain gaseous/continuous sites statewide.	Ongoing	Ongoing
	Operate and maintain particulate monitoring sites statewide.	Ongoing	Ongoing
	Operate and maintain Meteorological Monitoring Equipment.	Ongoing	Ongoing

Program objective	Activity	Milestone/Measure	End of Year Status
	Air Quality Forecasting and Air Quality Index (AQI) Reporting on a daily basis.	Ongoing	Ongoing
3.5 Implement the Colorado Regional Haze SIP	Develop SIP strategic plan to coordinate, to the extent allowed, planning efforts for ozone and Regional Haze.	Ongoing	Ongoing. Plan revised in 2014.
3.6 Support Class I Attributable Visibility Impairment Visibility SIP	Assemble and analyze IMPROVE monitoring data using statistical methods such as factor analysis, trajectory models, and chemical mass balance models. Develop computer programs to assist with processing of improve data for analysis.	Ongoing, as needed.	As needed
	Provide technical assistance to various visibility workgroups as requested.	Ongoing	Ongoing
	Continue to work resolve certification issues.	Ongoing	Ongoing
	Three-year review of federal land manager activities as required by SB 17 developed.	Ongoing	As needed
	Participate in SIP calls.	Ongoing	As needed
3.7 AQRV monitoring for Mt. Zirkel	Maintain close coordination with the USFS, EPA, and USGS.	Ongoing	Completed.
	Maintain ongoing communication with stakeholders and the public.	Ongoing	Completed.
	Support of snowpack and lake sampling in the Zirkel area through annual contract with USGS.	Ongoing.	Ongoing
3.8 Continue implementation of effective fire and smoke management and prescribed fire program	Develop and revise, as needed, Wildfire Response Plan and Protocol. During wildfire events and large prescribed fires, assist land managers in conducting PM monitoring. Coordinate with public information officer and meteorologist.	Ongoing	Ongoing

Program objective	Activity	Milestone/Measure	End of Year Status
	Participate in the Front Range Fuels Partnership as appropriate.	Ongoing	Ongoing
	Work with local communities and partnerships to address wildland fuels treatment as needed.	Ongoing	Ongoing
	Coordinate with Federal agencies and private entities conducting visibility, lake chemistry and acid deposition monitoring and research in Colorado. Agencies and contractors, to varying degrees, are also involved in AQRV model development.	Ongoing	Ongoing
3.9 Track program effectiveness indicators through haze monitoring, inventories and modeling	Perform audits of IMPROVE samplers.	Ongoing	Ongoing. All annual audits were completed in August-September 2014.

## 4.0 Water Quality Control Division - FY 2014 Work Plan Status and Accomplishments

Water Quality Control Division Goals – Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
1.0 Ambient Water Quality Monitoring – Monitor chemical, physical and biological conditions of all state surface waters so that water quality decisions are well supported with adequate data.			
EPA 2011 – 2015 Strategic Plan Goal 2: Protecting America’s Waters, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems			
1.1 Monitor chemical, physical and biological conditions of all state surface waters so that water quality decisions are well supported with adequate data. (Watershed Section Multi-Year Priority)	1.1.1 Conduct monitoring for all basins to support triennial reviews, preparation of the Integrated Report, and evaluations of PS/NPS infrastructure investment effectiveness in targeted water bodies.	1.1.1.1 Chemical data will be managed in local EQuIS, for use in basin-wide assessments.	1.1.1.1 All chemical data collected are managed in the local EQuIS database for use in basin-wide assessments. The data flow to the national data warehouse via a WQX enabled CDX node has been implemented successfully.
	1.1.2 Pursue and continue development of a statewide ambient ground water monitoring plan.	1.1.2.1 Continue to sample ambient ground water.	1.1.2.1 Coordinated sampling through Colorado Department of Agriculture.
		1.1.2.2 Participate in GWPC.	1.1.2.2 Quarterly meetings held as scheduled.
		1.1.2.3 Assess and coordinate regarding ground water quality and associated issues with other state agencies.	1.1.2.3 Coordination meetings held as needed.
1.2 Development and Implementation of a Comprehensive Monitoring Strategy.			
1.2.1 Number of states and territories that have adopted and are implementing their monitoring strategies ( <i>The 10 Elements</i> ) in keeping with established schedules	1.2.1.1 a) Continue implementing Colorado’s Water Quality Monitoring and Assessment Strategy ( <i>The 10 Elements</i> ) 2004-2014. b) Develop a Draft Colorado’s Water Quality Monitoring and Assessment Strategy ( <i>The 10 Elements</i> ) 2015-2025. c) Develop annual feedback loop with EPA R8 to report/discuss progress of <i>The 10 Elements</i> implementation.	1.2.1.1.1 a) Enhanced annual monitoring plan fully developed by June 30 each year. b) Annual feedback loop with EPA R8 [on <i>The 10 Elements</i> ] in place by mid-year update. c) Electronic data flow improvement between WQCD, LSD (lab), and EQuIS ongoing. d) Upload state water quality data into national STORET warehouse annually by September 30.	1.2.1.1.1 a) An enhanced annual monitoring plan was implemented by June 30, 2013. <i>The 10 Elements</i> document and the Section 106 Categorical grant are used to guide these enhancements. b) <i>The 10 Elements</i> were updated in SFY2007 and submitted to EPA for review. EDU continues to work with EPA coordinator to keep this document current. Communication and coordination with EPA on <i>The 10 Elements</i> and other topics has improved in SFY 2013. c) WQCD and LSD (Lab) participated in a LEAN event to continue to make electronic data flow improvements. The LEAN event is still being implemented. EDU staff has made improvements in the procedures for populating EQuIS in a timely and effective manner. d) Testing of the data flow to the national data warehouse via a WQX enabled CDX node was completed with a successful upload.

Water Quality Control Division Goals – Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
1.2.2 Develop categorical grant application and work plan for the SFY14 Monitoring Initiative to advance specific portions of The 10 Elements strategy. Coordinate with EPA staff to develop categorical grant application for the SFY14 Monitoring Initiative.	1.2.2.1 a) Implement the detailed Monitoring Initiative work plan. b) Additional laboratory analyses of stream and reservoir water samples to expand scope of chemical and biological data. c) Review National Lake Assessment Data from the National Lake Assessment Probabilistic Survey. d) Request In Kind services for Monitoring Initiative Grant for National Rivers and Streams Probabilistic Survey. e) Development of a state-scale rivers/streams probability-based assessment (based on NRSA 2008-2009 data).	1.2.2.1.1 a) SFY13 Monitoring Initiative tasks completed by Sept 30, 2014. b) SFY13 Monitoring Initiative tasks completed by Sept 30, 2014. c) Summarize results in 2016 Integrated Report. d) Workplan and application for FFY14 Monitoring Initiative in Fall/Winter-2013. e) Draft state-scale rivers/streams probability-based assessment (based on NRSA 2008-2009 data). Final to be included in the 2016 Integrated Report.	1.2.2.1.1 a) Workplan was developed, submitted and approved by EPA. b) Tasks completed within allotted time frames. c) The next 305b Report (2014/2016) will be submitted to EPA on 4/1/2016. d) Workplan and application were submitted and approved on time. e) WQCD continues to work with EPA on the draft state-scale rivers/streams probability-based assessment (based on NRSA 2008-2009 data). The final is planned to be submitted in April 2014 as a separate report. It will be included in the 2014/2016 IR on 4/1/2016.
1.2.3 Assist in developing a comprehensive statewide wetland program strategy.	1.2.3.1 Participate in the development a comprehensive statewide wetland program strategy with EPA and the other state “implementing agencies”.	1.2.3.1.1 Follow-up meetings scheduled by EPA such that roles and responsibilities of the various state and federal agencies are clarified.	1.2.3.1.1 WQCD met and discussed wetland strategies with EPA and the CO Natural Heritage Program. Reporting of wetland conditions was included in the 2012 Integrated Report.
2.0 Water Quality Assessment and Standards Development – Assess quality of state waters to support decision-making.			
EPA 2011 – 2015 Strategic Plan Goal 2: Protecting America’s Waters, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems			
2.1 Assess Whether Fish are Safe to Eat			

Water Quality Control Division Goals – Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
2.1.1 Percentage of lake acres & river miles where fish tissue will be assessed to support water body-specific or regional consumption advisories, or a determination that no consumption advice is necessary. (FY14 FS-1a and 1b) (Watershed Section Multi-Year Priority)	2.1.1.1 To monitor and assess fish tissue data for mercury, (and where relevant selenium and arsenic) from 7 water bodies (reservoirs, lakes and rivers).	2.1.1.1.1 a) Issue or rescind FCAs where appropriate. b) Update on National List of Fish Advisories. c) Develop and implement statewide fish consumption guidelines.	2.1.1.1.1 a) WQCD FCA website updated regularly as information is developed. b) Participated in the update of the national List of Fish Advisories as requested by EPA. c) WQCD developed and implemented statewide fish consumption guidelines.
2.2 Assess Quality of State Waters to Support Decision-Making and Document Changes Over Time			
2.2.1 Improve water quality conditions in impaired watershed nationwide using the watershed approach. (cumulative) (FY14 WQ-SP10.N11, WQ-SP11,WQ-SP12.N11, WQ-10)	2.2.1.1 a) River, stream and lake segmentation will be available in a GIS environment. b) Determine the distribution of water quality standards impairment by watershed. c) Information from the 303(d) and M&E Lists will be managed in a database that can be linked to GIS information. d) Identify 10 or 12-digit HUC watersheds where improvements have been demonstrated.	2.2.1.1.1 a) Draft GIS layers with WQCC regulations segments. b) Draft GIS layer with impaired segments information. c) Maintain linkage between database for 303(d) and M&E List Information and reach indexed NHD coverage. d) FY14 – 1 watershed.	2.2.1.1.1 a) Colorado continues to work with EPA to make the reach indexed NHD coverage as complete and accurate as possible as basin regulations are revised. b) Colorado has developed a GIS of the 2012 303(d) List of Impaired Waters. c) Colorado continues to work with EPA to make the reach indexed NHD coverage as complete and accurate as possible. d) Several watersheds are being investigated for potential water quality standards attainment but still pending resolution. Seeking input and review from EPA and other partners.
2.2.2 Number of water bodies identified in 1998 as not attaining standards where water quality standards are fully attained. (21,632 water bodies; 255,408 miles and 6.8 million acres) (FY14 SP-10).	2.2.2.1 Document water quality improvement over time.	2.2.2.1.1 Using the tools developed in Activity 2.2.1; continue tracking how many of the impaired segments from the 1998 303(d) list are fully attaining water quality standards as of 4/1/12.	2.2.2.1.1 This information will be available in the 2014/2016 Integrated Report.
2.2.3 Number of states, interstate agencies, and territories that provide comprehensive integrated assessments of the condition of their waters consistent with sections 305(b) and	2.2.3.1 Provide consistent and accurate assessment of the state's surface waters and provide the information to EPA and the Public.	2.2.3.1.1 Develop Colorado's 2014/2016 Section 303(d) Listing Methodology in an open and public process.	2.2.3.1.1 The process to develop the 2104/2016 Section 303(d) Listing Methodology is ongoing with significant input from stakeholders.

Water Quality Control Division Goals – Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
303(d) of the Clean Water Act and EPA's integrated assessment guidance. (Watershed Section Multi-Year Priority)	2.2.3.2 Begin to prepare data to support the development of the 2014/2016 Integrated Report.	2.2.3.2.1 Begin to prepare data to support the development of the 2014/2016 Integrated Report.	2.2.3.2.1 The 2014/2016 Integrated Report will be submitted on 4/1/2016.
2.2.4 Utilize Assessment Database (ADB) and GIS to record monitoring and assessment decisions (FY14 WQ-7).	2.2.4.1 Continue to update ADB and associated GIS coverages with assessment data.	2.2.4.1.1 Updated ADB and GIS by 4/1/16 as submitted in 2014/2016 Integrated Report.	2.2.4.1.1 WQCD will submit an accurate version of the ADB and NHD to EPA on 4/1/2016.
2.2.5 Number of water bodies identified by states (in 1998/2000 or subsequent years) as being primarily nonpoint source (NPS)-impaired that are partially or fully restored. (cumulative) (Watershed Section Multi-Year Priority FY14 WQ-10)	2.2.5.1 a) Develop the ability to track impairment by source as well as pollutant. b) Identify candidate water bodies and document successes based on the 1998 303(d) list and subsequent 305(b) or integrated reports and complete nonpoint source projects. c) Determine improving water quality and progress towards attaining applicable water quality standards and classifications.	2.2.5.1.1 a) Using the tools developed in Activity 2.2.1, continue to determine the number of water bodies that are being impaired by nonpoint sources. b) Submit a minimum of one draft success story for EPA consideration in FY2013 based on the 1998 or later 303(d) list. c) FY14 – 1 Watershed.	2.2.5.1.1 a) Information will be available in the Integrated Report. b/c) Several watersheds are being investigated for potential water quality standards attainment but still pending resolution. Seeking input and review from EPA and other partners.
2.3 Water Quality Criteria and Standards Development			
2.3.1 Number of states & authorized tribes that have completed a review of water quality standards within three years of the previous triennial review under Section 303(c) of the CWA (FY09 WQ 3a; FY10 WQ-3a), that reflect new scientific information from EPA or other resources not considered in the previous standards (FY13 WQ-031) and percent of state and territorial WQS submissions that are approved by EPA (FY14 WQ-04a).	2.3.1.1 Continually review water quality standards and revise them if necessary in accordance with state and federal statute and Water Quality Control Commission schedule.	2.3.1.1.1 a) Scoping Hearing Reg #38: 10/2013. b) Formulation Hearing Reg #33 & #33: 11/2013. c) Rulemaking Hearing All Regs (Temp Mods): 12/2013. d) Rulemaking Reg #33 & #37:6/2014. e) Prepare notice for Temp Mods rulemaking (by 8/1/2014).	2.3.1.1.1 a) Scoping Hearing Reg #38: held on schedule. b) Formulation Hearing Reg #33 & #37: held on schedule. c) Rulemaking Hearing All Regs (Temp Mods): held on schedule. d) Rulemaking Reg #33 & #37: held on schedule. e) Notice for Temp Mods rulemaking: completed.

Water Quality Control Division Goals – Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
2.3.2 Number of numeric water quality standards for total nitrogen and for total phosphorus adopted by states and territories and approved by EPA, or promulgated by EPA, for all waters within the state or territory for each of the following water body types: lakes/reservoirs, rivers/streams and estuaries. (cumulative, out of a universe of 280) (FY14 WQ-01a) (Watershed Section 2010-11 Priority)	2.3.2.1 Continue to implement the Nutrient Criteria Development Plan for Colorado, September 26, 2002, Colorado Department of Public Health & Environment, or any revisions to this plan.	2.3.2.1.1 a) Provide work products on the tasks identified in milestone schedule and number of applicable standards actions.	2.3.2.1.1 a) Work items completed as scheduled (TP considered in UpCo/LoCo rulemaking according to plan).
2.3.3 Number of states making strong progress toward reducing nitrogen and phosphorus pollution by setting priorities on a watershed or statewide basis, establishing nutrient reduction targets, and continuing to make progress (and provided performance milestone information to EPA) on adoption of numeric nutrient criteria for at least one class of waters by no later than 2016 (cumulative).	2.3.3.1 Continue to implement the Nutrient Criteria Development Plan for Colorado, September 26, 2002, Colorado Department of Public Health & Environment, or any revisions to this plan.	2.3.3.1.1 a) Provide work products on the tasks identified in milestone schedule and number of applicable standards actions.	2.3.3.1.1 a) Work items completed as scheduled (TP considered in UpCO/LoCo rulemaking according to plan).
3.0 Water Quality Management Planning and TMDL Development – Assure that the watershed approach becomes an effective organizing principle for improving water quality.			
EPA 2011 – 2015 Strategic Plan Goal 2: Protecting America’s Waters, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems			
3.1 Support the development and implementation of watershed restoration plans			
3.1.1 Continue development and implementation of the statewide Water Quality Management Plan. Continue to integrate updated 604(b) work plans with designated regional water quality planning agencies to support the watershed approach. (Watershed Section 2013-2014 Priority)	3.1.1.1 Support coordinated regional water quality planning and integrate those efforts with the ongoing work in the four designated COG areas.	3.1.1.1.1 Submittal of annual grant application and agency work plans to EPA for approval. Execution of purchase orders or contracts with planning agencies.	3.1.1.1.1 Final Reports for funding year 2013 designated planning agency workplans were submitted and accepted by the division for incorporation in the division’s final report and the final report was submitted to EPA.  Annual grant application for funding year 2014, including division and designated planning agency workplans, was submitted, and grant was awarded.  Purchase orders implementing the funding year 2014 grant were executed with the designated planning agencies.



Water Quality Control Division Goals – Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
3.1.2 Number of water segments known to be impaired or threatened based on Colorado 1998 303(d) list for which state and EPA agree that the water body is fully restored, partially restored, or initial restoration planning is complete (FY14 – SP10, SP-11).	3.1.2.1 Continued completion of restoration planning and implementation to improve water quality in water bodies not attaining water quality standards.	3.1.2.1.1 a) Targeted number of water segments fully restored in FY13 (SP-10); 1. b) Targeted number of water quality impairments restored in FY13 (SP-11); 1.	3.1.2.1.1 a) Several water segments are being investigated for potential water quality standards attainment but are still pending resolution. Seeking input and review from EPA and other partners. b) Currently evaluating/assessing the state for the 2016 303(d) List which will assist with the investigation.
3.1.3 Improve water quality conditions in impaired watersheds nationwide using the watershed approach (cumulative) (FY13 WQ-SP12.N11 ).	3.1.3.1 Identify 10 or 12-digit HUC watersheds where improvements have been demonstrated.	3.1.3.1.1 FY14 - 1 watershed with an existing TMDL.	3.1.3.1.1 Several watersheds are being investigated for potential water quality standards attainment but still pending resolution. Seeking input and review from EPA and other partners.
3.1.4 Number and national percent of TMDLs that are developed by states and approved by EPA on a schedule consistent with national policy (FY11 WQ-8a & 8b; FY12 WQ-8b).	3.1.4.1 Continue to develop TMDLs for Colorado's impaired waters in accordance with EPA guidance and state policy.	3.1.4.1.1 Submit 20 TMDLs for approval by EPA.	3.1.4.1.1 Zero (0) TMDLs submitted to EPA that were approved between 7/1/2013 and 6/30/2014.
3.1.5 Participate in formulating a new 303(d) program long term vision with defined goals and implementation plans.	3.1.5.1 Support the vision concept and develop a draft plan that outlines a comprehensive, integrated, and iterative approach to achieving, measuring, and communicating water quality improvements.	3.1.5.1.1 a) Identify primary contact for developing vision plan. b) Primary contacts will lead discussions to outline key people and vision milestones for FY14. c) Participate in teleconference call with EPA to discuss vision plan and milestones for FY14.	3.1.5.1.1 a) Identified primary contact for developing vision plan. b) Primary contact led the discussions at the division and with EPA. c) Participated through in-person workshop and teleconference with EPA staff.
4.0 Permitting Program			
EPA 2011 – 2015 Strategic Plan Goal 2: Protecting America's Waters, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems			
4.1 Complete a comprehensive assessment of NPDES program integrity and, as appropriate, establish an implementation schedule.	4.1.1 Continue to implement action items identified from EPA Region 8's 2007 State Audit, and EPA HQ 2010 Permit Quality Review.	4.1.1.1 In accordance with WQ-11: the division will provide information in the State End-of-Year report on the number of follow up actions completed as result of a comprehensive assessment of NPDES program integrity.	4.1.1.1 The division does not currently have any follow-up actions.
		4.1.1.2 For all domestic and industrial entities (including select stormwater sector permits) with NPDES permits, enter permit facility data, permit event data and inspection data, including SSO Inspections, into ICIS. The division commits to re enter permit facility data, permit event data and	4.1.1.2 The division has met this commitment and the information has been entered into ICIS.

Water Quality Control Division Goals – Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
		inspection data, including SSO Inspections, into ICIS for existing permitted facilities as the permits are renewed and for new facilities as the permits are issued.	
4.2 Continue to address concerns regarding EPA's 2003 Permitting for Environmental Results strategy.	4.2.1 Achieve environmental results by maintaining a 90% overall CDPS permit issuance rate.	<p>4.2.1.1 In accordance with WQ-12a: the division will provide information in the State End-of-Year report on the percentage of all non-tribal NPDES permits that are considered current (excluding storm-water general permit certifications). The division will update EPA's Permit Management Oversight System (PMOS) for non-stormwater general permits. EPA will use ICIS information for individual permit counts.</p> <p>The division commits to 80% current at the end of FY14, based on EPA's rules of permits included in the backlog count and the 180-day grace period. The estimated number of current permits is 1261 of a universe of 1580. The state measure includes the same permits in the backlog measure but does not include the 180-day grace period and the division projects 77% current based on the state measure. The estimated number of current permits is 1226 of a universe of 1580. If the percent current is less than 70% per the EPA measure, Colorado will provide an overall permit issuance/backlog reduction plan showing how the state will expeditiously reduce the backlog. The division recognizes that the 80% commitment is not consistent with the national goal of 90% and will continue to work toward addressing the issues that prevent the division from being able to sustain a commitment of 90% current.</p>	<p>4.2.1.1 For FY2014, the division's estimate of backlog based on the EPA measure as of October 1, 2014 is 38% backlogged or 62% current which falls short of the 80% commitment. Because it is below 70% current, the estimate triggers the development of a backlog reduction plan. The division is in the process of development of a backlog reduction plan and that plan will be submitted to EPA.</p> <p>For FY2014, the division's estimate of backlog based on the state measure as of October 1, 2014 is 40% backlogged or 60% current.</p>

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
	4.2.2 Achieve environmental results though the timely issuance of high priority permits.	4.2.2.1 In accordance with WQ-19a: The division will enter a high priority permit commitment in EPA’s PMOS database. The division will submit the number of priority permits by September 30, 2013. The division will develop the list and update EPA on the status of these permits through EPA’s PMOS database.	4.2.2.1 For FY2014, the division selected 27 priority permits, committed to issue 22 and issued 9. The division fell short of the commitment because a number of high priority permits received significant public comment and additional time was needed to respond to public comments and issue those permits. In addition, several high priority permits were not drafted as anticipated due to the extra staff time that was spent on two key general permits, the sand and gravel general permit and the MS4 general permit. In addition, overall permit production was lower for FY14 due to vacancy and staffing changes as further described in the backlog reduction plan. Additionally, the division is revising its work planning methodology to be more conservative in work planning projections.
4.3 Report on the number of facilities covered by an individual or general permit.	4.3.1 The following categories (reported separately). 13a: Number of MS4s; 13b: Number of industrial stormwater facilities; 13c: Number of construction stormwater facilities; and 13d: Number of CAFOs.  Ensure that data that are not maintained in ICIS are available to EPA.	4.3.1.1 In accordance with WQ-13a-d: The division will report on these permit numbers through EPA’s PMOS database for permits not included in ICIS. The division is actively working to include industrial stormwater (non-construction) permits into ICIS.	4.3.1.1 The division has met this commitment and the information has been entered into PMOS.
		4.3.1.2 CDPHE will provide EPA with an electronic copy of the stormwater permit tracking system by March 31, 2014 and September 30, 2014, or until stormwater permits are entered into ICIS. Quarterly, until stormwater permits data are entered into ICIS, provide EPA with a current number of industrial and construction stormwater permits. (October 15, 2013, January 15, 2014, April 15, 2014 and July 15, 2014.)	4.3.1.2 The division has met this commitment and the information has been provided to EPA.
4.9 Pursue delegation of federal authority to implement the Biosolids and Pretreatment programs in Colorado			
4.10 Conduct a Biosolids Management Program, which implements the requirements of the Colorado Biosolids Regulations, while not duplicating EPA programmatic efforts.	4.10.1 Colorado continues to indicate in the fact sheet for sewage system permits that generators must be covered under the general permit from EPA. No biosolids language is included in sewage system permits since it is expected that they have	4.10.1.1 Continue to implement the state biosolids land application regulation in and coordinate with EPA to avoid duplication of efforts.	4.10.1.1 Twenty-one (21) new biosolids land application sites were approved.  A total of 68,454 Dry Metric Tons of biosolids were beneficially reused via composting and land application including rangeland and reclamation.  The division continues to implement a state biosolids program in coordination with EPA to avoid duplication of

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
	separate permit coverage from EPA. Colorado continues to implement the state program that regulates land application of biosolids, a program that is consistent with the federal biosolids land application requirements.		efforts.
	4.10.2 Pursue delegation of the Biosolids Program from EPA.	4.10.2.1 Report in the State End-of-Year Report on progress of obtaining Biosolids Program delegation.	4.10.2.1 The division engaged stakeholders as part of a larger public process regarding clean water fees regarding potential statutory authority to increase fees for land application and DWWTWs to allow for future delegation.
4.11 Conduct an Industrial Pretreatment Program that implements the requirements of the Colorado Pretreatment Regulations while not duplicating EPA programmatic efforts.	4.11.1 As Colorado is not delegated for the pretreatment program, EPA is the lead authority on measure WQ-14a, which is number and percent of Significant Industrial Users (SIUs) in POTWs with pretreatment programs that have control measures in place.	<p>4.11.1.1 As Colorado has a state pretreatment program, Colorado actively works to permit SIUs in non-pretreatment POTWs and coordinates this effort with EPA. (WQ-14b)</p> <p>In FY14 Colorado and EPA will work collaboratively to complete Standard Operating Procedures which identify the roles and responsibilities for effective implementation of the industrial pretreatment permit language, inspection coordination, and enforcement process between the two agencies.</p> <p>EPA will provide Pretreatment language for approved and non-approved programs to CDPHE for incorporation into the state-issued NPDES permits.</p> <p>During FY14 the division will be working collaboratively with EPA (who is the pretreatment authority in CO) to make progress on getting pretreatment influent and effluent sampling data into ICIS.</p>	<p>4.11.1.1 The division issues Notice of Discharge Requirements (NDRS) in accordance with state regulation to significant categorical and non-categorical and non-significant categorical industrial users that discharge to POTWs without approved pretreatment programs. Currently there are 11 facilities covered by division-issued NDRs--8 significant industrial user categorical facilities, 2 significant industrial user non-categorical facilities, and 1 non-significant categorical industry.</p> <p>The percentage of Significant Industrial Users in POTWs with Pretreatment Programs is determined by EPA.</p> <p>The division and EPA did not identify that there was consensus on the need for additional SOPs.</p>

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
		4.11.1.2 Report in the State End-of-Year Report on progress of obtaining Pretreatment Program delegation.	4.11.1.2 The division engaged stakeholders as part of a larger public process regarding clean water fees regarding potential statutory authority to increase fees for POTWs and authorized industrial users to allow for future delegation.
5.0 Compliance Assurance (for pollution control facilities) – In support of the Clean Water Action Plan, EPA Region 8 and Colorado will collaborate to identify priorities for compliance and enforcement resources to ensure that the largest threats to water quality are prevented and/or addressed.			
EPA 2011 – 2015 Strategic Plan Goal 2: Protecting America's Waters, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems Goal 5: Enforcing Environmental Laws, Objective 5.1, Supporting Goal 2			
5.1 Conduct inspections of and/or monitor self-reported data submitted by, the state's CDPS discharges to positively determine the compliance status of regulated facilities and activities.	5.1.1 Conduct NPDES inspections described in the inspection plan for the period of October 1-September 30 of each year. Complete inspection reports and enter into ICIS database by December 15th of each year for permit types included in ICIS. Submit draft inspection plan that includes the CDPHE inspection commitments for the coming federal fiscal year (October 1-September 30) by September 1st and finalize the plan within 15 days of receiving EPA comments. Colorado will identify and formally track violations that cause or threaten water quality impacts detected during process water inspections to gain compliance. The state inspection plan provides target projections and/or lists of specific facilities to be inspected for each media program.  Colorado and EPA Region 8 may participate in a number	5.1.1.1 Report to EPA in the State End-of-Year Report the number of each of the following inspections: <ul style="list-style-type: none"> <li>- Majors,</li> <li>- Minors,</li> <li>- SSOs,</li> <li>- construction stormwater,</li> <li>- industrial stormwater,</li> <li>- MS4,</li> <li>- Pretreatment industrial users,</li> <li>- Biosolids facilities,</li> <li>- Biosolids land application sites,</li> <li>- Pesticides.</li> </ul> Also, provide the status summary of inspection follow-up activities in the End of Year Report.	5.1.1.1 <b>Major Permits</b> (not listed below): A total of 41 facilities with major permits were inspected, in addition to those minors listed separately in the categories below. The inspection plan identified an objective of 41 major facilities, in addition to those minors listed separately in the categories below.  <b>Minor Permits</b> (not listed below): A total of 151 facilities with minor permits were inspected, in addition to those minors listed separately in the categories below. The inspection plan identified an objective of 135 minor facilities, in addition to those minors listed separately in the categories below.  <b>SSO:</b> Four inspections targeted to evaluate SSO issues. Follow-up activities for these inspections are in progress.  <b>Construction Facilities (including Construction Stormwater):</b> A total of 79 construction sector site CEI inspections were completed and 15 non CEI inspections. The inspection plan identified an objective of 36 construction discharge inspections. These inspections address compliance for stormwater, dewatering, groundwater remediation and hydrostatic discharges at construction sites. The non-CEI inspection did not generate inspection reports and included 4 inspections conducted as part of training classes, 3 reconnaissance inspections and 18 site visits to support the Colorado Stormwater Excellence Program.  <b>Industrial Stormwater:</b> A total of 42 industrial facility, including mining, stormwater CEI inspections were

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
	of joint/oversight inspections at regulated facilities during the inspection year. EPA will contact the state to schedule joint inspections at facilities identified in the division's inspection plan.		<p>completed. The inspection plan identified an objective of 32 industrial facilities stormwater inspections. Twenty-two industrial facility - including mining, stormwater CEI - inspections were completed as part of inspections of facilities with process water permits. Twenty industrial facility, including mining, stormwater CEI inspections were completed of facilities without process water permits.</p> <p><b>MS4s:</b> As addressed in the inspection plan, commitments in the plan are estimates of how oversight resources will be targeted. The division did not target oversight consistent with those estimates. No construction site inspections or screening inspections were conducted. However, the division completed one unanticipated oversight site visit as a result of a complaint. Annual reports were reviewed for all MS4 permits/certifications. Extensive resources were devoted to permit renewals in IY14.</p> <p><b>Pretreatment Industrial Users:</b> No inspections were conducted for pretreatment industrial users. The inspection plan identified an objective of 0 industrial facilities stormwater inspections.</p> <p><b>Biosolids Facilities:</b> A total of 40 facilities inspections were completed (23 at major facilities, 17 at minor facilities). The inspection plan identified an objective of 62 site inspections.</p> <p><b>Biosolids Land Application Sites:</b> A total of 50 biosolids land application sites inspections were completed. The inspection plan identified an objective of 59 site inspections. The division had anticipated 80% of contracted inspections being completed; however, the local health department contracted to perform these inspections were not able to meet that goal in 2014.</p>

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
	5.1.2 The EPA has completed a compliance assessment of 75% of Phase I MS4 permittees (4 out of 5). All Phase I MS4 issues will be addressed by FY16.	5.1.2.1 EPA Region 8 or Colorado will continue to discuss the status of addressing actions at their quarterly meetings.	
	5.1.3 Continue to conduct the DMR Quality Assurance program.	5.1.3.1 Follow up on all significant problems with DMR QA and provide EPA with a summary of follow-up actions in the State End-of-Year Report.	<p>5.1.3.1 DMR QA Study 34 was conducted in the state of Colorado for the calendar year 2014. DMR QA Study 34 closed on July 11, 2014, and any necessary corrective action reports were due no later than October 10, 2014. One hundred twenty-one (121) major facilities were required to participate in DMR QA Study 34. Six (6) minor facilities and one (1) federal facility voluntarily participated in the study. Of the 121 facilities that were required to participate, 119 facilities actually participated in the study.</p> <p>Of the 119 participating facilities, thirty-six (36) facilities submitted data with unacceptable results. Twenty-nine (29) of these facilities remedied the unacceptable results with corrective actions. An additional three (3) facilities are in the process of ordering necessary equipment to complete their corrective action(s) and/or conducting side by side testing to confirm that the corrective action(s) will yield acceptable results. One (1) of the thirty-six (36) facilities produced acceptable retest results but did not indicate what corrective actions had been implemented. The remaining four (4) facilities did not respond to the unacceptable results and the division remains currently unaware of the status of any corrective actions or retests.</p> <p>It should be noted that the two (2) facilities who did not participate and the four (4) who have yet to respond to unacceptable results do not indicate recurring issues from DMR QA 33.</p> <p>The division is continuing to review and follow up with noncompliant facilities and may recommend sampling investigations for those facilities that fail to participate in future DMR QA studies, have recurring unacceptable results, fail to complete follow-up investigations or otherwise have questionable results</p>

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
			and/or response actions.
	5.1.4 Assure proper implementation and consistent enforcement of whole effluent toxicity (WET) in CDPS permits.	<p>5.1.4.1 Submit as part of the State End-of-Year Report:</p> <p>a) A list of facilities which entered into a TIE or TRE in FY14.</p> <p>b) A list of any formal enforcement actions taken in FY14 that included WET violations.</p> <p>Also, ensure facilities with WET effluent limits and WET monitoring are up-to-date in ICIS.</p>	<p>5.1.4.1 All WET limits and WET monitoring appear up to date in ICIS. Due to the many nuances of WET data, the division continued to manually track WET results and requirements in an Excel format in FY14.</p> <p>The division provided compliance assistance to nine (9) entities with regard to the notification and automatic compliance requirements associated with WET failures during the report only phase of WET limit implementations.</p> <p>Accelerated testing was completed by eleven (11) entities as part of the required WET automatic compliance response. One or more PTIE/TIE was completed by six (6) entities as part of the required WET automatic compliance response. A TIE is planned to be completed by one (1) more entity once discharge resumes as part of the required WET automatic compliance response. The division worked with three (3) entities to develop and approve specific WET compliance plans that will be implemented during each entity's report only period. The division worked with one (1) entity to develop and approve a WET corrective action plan for a new treatment system designed to allow the entity to meet WET limits. One (1) entity has decided to cease discharge until a feasibility study can be completed, due to tracked WET failures.</p> <p>No formal enforcement actions were taken based solely on WET violations. However, copies of enforcement actions that may have included WET violations were provided to EPA as those enforcement actions were issued.</p>
		5.1.4.2 Develop an Enforcement Response Guide for WET or incorporate WET enforcement response procedures into the existing Enforcement Management System. Submit as part of the State End-of-Year Report as status summary.	5.1.4.2. The division completed a draft Enforcement Response Guide for WET during FY14. The Enforcement Response Guide will be incorporated in a larger update and revision to the division's Enforcement Management System which is planned to be completed in FY15.



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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
5.2 Continue to implement the Sanitary Sewer Overflow (SSO) Response Strategy until such time as the SSO regulations are finalized.	5.2.1 Colorado will continue to implement its SSO Response Strategy as modified for FY2014.	<p>5.2.1.1 Provide to EPA by October 15 of each year:</p> <ul style="list-style-type: none"> <li>a) an updated SSO inventory;</li> <li>b) the number of NPDES inspections targeted to evaluate SSO issues;</li> <li>c) the number and percent of SSO inspections in priority watersheds (i.e. 303(d) listed for E. coli) including the name of the priority watershed (beginning with the October 2013 report);</li> <li>d) the number and type of informal and formal enforcement actions taken in response to SSOs;</li> <li>e) the percent of enforcement actions in priority watersheds for SSOs (beginning with the October 2013 report); and</li> <li>f) a list of SSOs addressed.</li> </ul> <p>Copies of all SSO inspections and enforcement actions will be submitted to EPA.</p>	5.2.1.1 See item-specific Deliverable Report provided to EPA October 14, 2014.
5.3 Compliance Assurance – Implement the federal and state laws, regulations and policies governing water quality in a timely, efficient and fair manner			
5.3.1 Maintain a high overall compliance rate with applicable statutes and regulations.	5.3.1.1 Evaluate violations and determine an appropriate response as identified in Colorado's Enforcement Management System. Where violations cause or threaten water quality impacts, determine an appropriate response consistent with priorities established in the Clean Water Action Plan and associated work plan strategies that focus on achieving environmental outcomes.	5.3.1.1.1 Continue to implement the Enforcement Response Guide and Stormwater Compliance and Enforcement Strategy for construction stormwater.	5.3.1.1.1 This commitment was met. All violations that met the formal enforcement criteria were reviewed and, absent resource limitations, responded to with formal enforcement as appropriate and warranted.
		5.3.1.1.2 Continue to implement and update as necessary the state's CAFO compliance and enforcement strategy and Enforcement Response Guide."	5.3.1.1.2 This commitment was met. No updates were identified as necessary. The division continued to implement the CAFO Enforcement Response Guide as last revised in July 2012. The CAFO Enforcement Response Guide will be incorporated in a larger update and revision to the division's Enforcement Management System which is planned to be completed in FY15.

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
		5.3.1.1.3 Quarterly during the fiscal year, the division will provide a response to the Quarterly Non-Compliance Report (QNCR). Include an explanation of what the division is doing to respond to the facilities in Significant Non Compliance (SNC) on the QNCR and report the number of SNC facilities on impaired waters.	5.3.1.1.3 This commitment was met each quarter following notification by EPA.  Seven (7) major facilities that discharge to impaired waters were in SNC status at some point during FY14. Zero (0) of the major facilities that were in SNC status for effluent violations discharged directly into a stream segment that is impaired for the same pollutant that was exceeded.
		5.3.1.1.4 On a quarterly basis complete the electronic explanation code sheets for the Watch List and forward to EPA Region 8. Discuss unaddressed facilities with EPA and coordinate with Region 8 on a plan to address these facilities.	5.3.1.1.4 This commitment was met up until EPA discontinued use of the Watch List during FY14.
		5.3.1.1.5 In the interest of conserving resources, Colorado agrees to EPA being the lead agency on all 404 enforcement actions that have associated CWA section 402 violations, except where EPA determines that combined cases may not be in the best interest of the litigation. Colorado will have the opportunity to join the 402/404 case if it is a judicial referral.	
		5.3.1.1.6 EPA will perform inspections in support of national enforcement initiatives and will provide the state with notice of the inspection in advance if possible. At the state's discretion, it may attend the inspection in an observer/consulting role. EPA will conduct inspection follow-up and enforcement for those facilities it inspects. The state will be given the opportunity to join any national case that includes violations discovered as a result of any EPA inspection in Colorado or, where no national case is filed, the state will be given the option of joining if the case is filed as a judicial referral.  Where the state has joined EPA in a national referral case, the state will inspect sites	

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
		targeted after any consent decree is final.  EPA will keep CDPHE informed of the Energy Extraction National Enforcement Initiative and discuss implementation opportunities during quarterly meetings in FY14.	
5.3.2 Promote communication with EPA.	5.3.2.1 Facilitate EPA oversight.	5.3.2.1.1 Report to EPA: a) final settlement agreements; and b) description of any SEPs included in the state enforcement actions concluded in the federal fiscal year.  Upon request, penalty calculations, including adjustments and BEN for state enforcement actions concluded during the fiscal year, will be made available to EPA at the state's offices.	5.3.2.1.1 The division provided EPA with copies of all settlement agreements at the time of each action's issuance. SEP descriptions were contained within those documents. The division did not receive any requests from EPA to review penalty calculations.
		5.3.2.1.2 Quarterly meetings between CDPHE and EPA will be held to discuss current and projected enforcement cases, inspection commitments, work conducted in priority areas and sectors, and any other items as necessary.	5.3.2.1.2 All quarterly meetings were held unless agreed upon otherwise.
5.3.3 Develop and maintain comprehensive database.	5.3.3.1 Ensure that all data requirements in ICIS are being entered and maintained.	5.3.3.1.1 CDPHE will continue development of its Single Event Violation (SEV) business process in FY14 in order to generally implement the EPA Wet Weather SNC Policy. CDPHE will complete this work in FY 14. CDPHE will provide updates to EPA regarding the SEV process during quarterly meetings. CDPHE will enter into ICIS, or otherwise report to EPA, single event violations related to formal SSO enforcement actions taken during FY14.	5.3.3.1.1 The division completed the development of a Single Event Violation (SEV) business process to generally implement the EPA Wet Weather SNC Policy. In FY15, the division intends to enter SEVs into ICIS associated with significant (i.e., SNC) stormwater, CAFO and SSO violations.  The division provided EPA with copies of all formal enforcement actions taken during FY14 at the time those actions were issued.
		5.3.3.1.2 Enter enforcement actions at CAFOs with NPDES permits into ICIS.	5.3.3.1.2 The division entered all enforcement actions taken in FY14 into ICIS, regardless of sector.

Water Quality Control Division Goals – Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
		5.3.3.1.3 CDPHE opts to maintain ICIS-NPDES and have data for the annual non-major facilities noncompliance report pulled by EPA in lieu of annual reporting.	5.3.3.1.3 While the division maintains the data in ICIS, corrections to the annual non-major facilities noncompliance report were manually reported to EPA in FY14.
6.0 Water Quality Restoration and Enhancement Efforts – Implement activities to improve water quality and attain water quality standards as affected by nonpoint source pollutants.			
EPA 2011 – 2015 Strategic Plan Goal 2: Protecting America's Waters, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems			
6.1 Nonpoint Source Program Implementation – Assure that the Clean Water Act Section 319 funds address high priority projects consistent with the watershed approach			
<p>6.1.1 Continue to provide funding for nonpoint source priority projects to identify solutions to nonpoint source pollution.</p> <p>(Section 319 – Funded FTE detail per new NPS Guidance:  Randal Ristau – 81%  Curtis Hartenstine – 67.26%  Tamara Allen – 45%  Bonie Pate – 70%  Lucia Machado – 100%</p> <p>Management oversight – 3 positions at 6.6%, 12.7%, and 25.36%  Fiscal Support – division at 2.9% and department at 3.3%  Measurable Results Project – 4 Positions: 1 at 5%, 1 at 20% and 2 at 30%. Remaining PPG is for laboratory analyses, sampling supplies and equipment, field work travel, etc.).</p>	<p>6.1.1.1</p> <p>a) Identify watershed plans to be developed for high priority watersheds.  b) Prepare statewide project funding list for public hearing by the WQCC.  c) Submit project implementation plans for EPA Region 8 approval.  d) Assure projects meet all federal and state reporting requirements.  e) Report project specific progress into GRTS.  f) Utilize EPA State Grant Performance Measures template for service area specific requirements.  g) Continue development and implementation of MRP to address effectiveness monitoring of NPS projects.</p>	<p>6.1.1.1.1</p> <p>a) Encourage local entities to develop watershed plans in high priority watershed.  Report number of plans or the number of requests for assistance generated by 6.1.2 on an annual basis.  b) Potential project sponsors and costs identified.  c) Site-specific project implementation plans developed where sponsors are identified.  d) Receive EPA Region 8 approvals.  e) Complete GRTS biannual updates.  f) Track and report on applicable performance measures.  g) For implementation projects, develop SAPP and monitoring plans to assess pre- and post-project water quality related data to document long-term effectiveness.  In conjunction with the Environmental Data Unit, conduct pre- and post-project monitoring for select projects to document long-term success.</p>	<p>6.1.1.1.1</p> <p>a) Continue to work with local watershed groups in priority watersheds and statewide. Currently, the state has 37 completed watershed plans, 4 of which were produced in FFY13/14; there are 5 ongoing watershed planning efforts.  b) Completed successfully during program FFY13/14 Request for Proposals.  c) Program successfully developed 7 project implementation plans during FFY13/14.  d) Successfully received EPA PIP approvals.  e) GRTS completed on time.  f) Continue to track and report on applicable performance measures.  g) Continue to coordinate pre and post project monitoring with the EDU. Conducted several sampling events and also conducted several sampling results assessments with EDU. Details of these monitoring efforts are in the 2013 NPS Annual Report.</p>
6.1.2 Annual reduction in lbs/tons of nitrogen from nonpoint sources to water bodies. (FY13 WQ-9a)	6.1.2.1 Determine nonpoint source pollutant loading reduction for nitrogen.	6.1.2.1.1 Nitrogen – Report actual load reductions in GRTS as project-specific information. Request load reduction estimates from new projects.	6.1.2.1.1 Total Nitrogen load reduction – 1,126 lbs/yr
6.1.3 Annual reduction in lbs/tons of phosphorus from nonpoint sources to water bodies. (FY13 WQ-9b)	6.1.3.1 Determine nonpoint source pollutant loading reduction for phosphorus.	6.1.3.1.1 Phosphorus – Report actual load reductions in GRTS as project-specific information. Request load reduction estimates from new projects.	6.1.3.1.1 Total Phosphorus load reduction – 559 lbs/yr

Water Quality Control Division Goals – Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FY 2014 Status and Accomplishments
6.1.4 Annual reduction in lbs/tons of sediment from nonpoint sources to water bodies. (FY11 WQ-9c; FY12 WQ-9c)	6.1.4.1 Determine nonpoint source pollutant loading reduction for sediment.	6.1.4.1.1 Sediments – Report actual load reductions in GRTS as project-specific information.	6.1.4.1.1 Total Sediment load reduction – 476 tons/yr
6.2 Federal Lands Consistency Reviews – Nonpoint Source Program coordination with public lands agencies			
6.2.1 Assure that the Nonpoint Source and SWAP Programs coordinate with public land agencies regarding potential water quality impacts of land use decisions and implementation.	6.2.1.1 Conduct federal consistency audits and arrangements with BLM and USFS.	6.2.1.1.1 Complete 2 USFS national forest or BLM district consistency audits and associated reports on protection or restoration of water quality standards and classifications.	6.2.1.1.1 Federal consistency audits were performed for two U.S. National Park Service historic sites in southeast Colorado: the Sand Creek Massacre and Bent's Old Fort sites. The reviews were conducted on September 23, 2014. Reports were prepared and will be submitted as part of the 2014 NPS Program Annual Report.

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FFY 2014 Status and Accomplishments
1.0 SDWA Regulatory Development – Adopt Primary Drinking Water Regulations to Maintain Primary Enforcement Authority.			
EPA 2011 – 2015 Strategic Plan Goal 2: Protecting America's Waters, Objective 2.1 Protect Human Health			
1.1 Adopt regulations within statutory deadlines or EPA approved extension schedule.	1.1.1 Submit primacy applications or apply for extensions before statutory deadlines.	1.1.1.1 The state currently has primacy enforcement authority for all existing rules. However, the state is rewriting its drinking water regulations to update them, eliminate outdated requirements, and to improve their readability in accordance with the governor's initiative to improve efficiency and reduce unneeded regulations. As agreed upon during the last workplan year, the state submitted its draft rewrite to EPA on May 15, 2013 to ensure that it is at least as stringent as the federal rules. Due to this rewrite reorganizing all of the drinking water regulations, EPA's review has generated significant numbers of comments. EPA and the state commit to addressing comments and issues related to stringency. The state commits to maintaining and implementing regulations that are at least as stringent as the federal Safe Drinking Water Act. The State will communicate on other primacy issues as appropriate.	1.1.1.1 This commitment was met. Colorado continues to work with EPA regarding EPA's comments that resulted from the Increased Readability rewrite of Colorado's drinking water regulations that became effective in March 2014. Colorado maintains and implements regulations that are at least as stringent as the federal Safe Drinking Water Act. Colorado communicates on other primacy issues as appropriate.
2.0 SDWA Control Mechanisms - Implement All Primary Drinking Water Regulations.			
EPA 2011 – 2015 Strategic Plan Goal 2: Protecting America's Waters			

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FFY 2014 Status and Accomplishments
2.1 Implement all primary Drinking Water Regulations for which Colorado has been delegated primary enforcement authority.	2.1.1 Report on the status of EPA-identified requirements of the surface water treatment rule.	2.1.1.1 By November 15, provide to EPA a list of all systems that are required to filter under the SWTR but are not yet filtering. Report the violations to SDWIS-FED. For systems on compliance schedules, provide the schedule from the enforcement document. If any system is not under a compliance schedule, provide a rationale and proposed action and time frame for securing compliance.	2.1.1.1 This commitment was met. Colorado reports violations to SDWIS-FED and provided the required list and associated information via letter to EPA on November 15, 2014.
		2.1.1.2 In FY 2012 CDPHE developed new methods for making GWUDI determinations. By September 30, 2014, the CDPHE will provide EPA staff with new GWUDI determinations with the status of compliance with treatment requirements for each system.	2.1.1.2 This commitment was met. Colorado submitted the required information to EPA via letter on September 30, 2014.
3.0 SDWA Compliance Assistance – Assist Regulated Entities to Consistently Provide Safe Drinking Water.			
EPA 2011 – 2015 Strategic Plan Goal 2: Protecting America’s Waters, Objective 2.1 Protect Human Health Goal 5: Enforcing Environmental Laws, Objective 5.1, Supporting Goal 2			
3.1 Implement Source Water Assessment Program (SWAP) and Wellhead Protection Programs.	3.1.1 Acquire federal DWSRF set-aside funding for program implementation.	3.1.1.1 Submittal of Wellhead Protection and Capacity Development Set-Aside Work Plan Amendments to EPA Region 8 by September 30 as necessary.	3.1.1.1 The Colorado Wellhead Protection (WHP) Set Aside 2013-2018 Workplan was submitted to EPA on May 24, 2013 and was approved on July 1, 2013. The effective workplan period is through June 2018. No amendments to the WHP or Capacity Development Set Aside Workplans were deemed necessary during FFY 2014.
	3.1.2 Assist public water systems in identifying potential sources of contamination and developing source water protection strategies.	3.1.2.1 Provide technical and programmatic assistance to public water systems and local interests implementing source water assessment and protection activities.	3.1.2.1 Technical and programmatic assistance has been provided to PWSs as outlined in the Integrated Source Water Assessment Project (ISWAP). The ISWAP was submitted to EPA on September 28, 2007. Assistance was provided to the PWSs on an as-requested basis throughout performance period.
	3.1.3 Implement coordinated program activities with Restoration and Protection Unit, Colorado Rural Water, and EPA Region 8.	3.1.3.1 Implement regular communication mechanism to insure coordination.	3.1.3.1 State and EPA staff had regular communication throughout the performance period to coordinate program activities. EPA Region 8 has re-introduced quarterly source water calls that CDPHE participates in. Source water assessment and protection planning contractor support is ongoing with Colorado Rural Water Association.

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FFY 2014 Status and Accomplishments
	3.1.4 Report program progress regarding program targets and actual completions.	3.1.4.1 Submit report to EPA identifying cumulative number of CWSs with a plan in place and substantial implementation of that plan and the population served by those CWSs by September 30.	3.1.4.1 2013 Performance Accountability Report submitted to the EPA on July 11, 2014.
3.2 Percent of community water systems where risk to public health is minimized by source water protection.	3.2.1 Reduce potential consumer exposure of community drinking water systems to various contaminants in raw water sources.	3.2.1.1 Report to EPA the number of source water areas with “minimized risk achieved by substantial implementation” of source water protection actions as determined by Colorado.	3.2.1.1 One hundred thirty-six (136) community water systems and their associated source water areas were reported with “minimized risk achieved by substantial implementation”. This equates to approximately 16% of community water systems in Colorado. Approximately twenty-one (21) protection planning grant applications were received in 2014. These protection planning efforts have assisted us in achieving our twelve (12%) percent goal outlined in the FY2014 Region 8/State PPA target setting table.
3.3 Percent of the population served by community water systems where the risk to public health is minimized through source water protection.	3.3.1 Reduce potential consumer exposure of community drinking water systems to various contaminants in raw water sources.	3.3.1.1 Report to EPA the population numbers served by community water systems where “minimized risk is achieved by substantial implementation” of source water protection actions, as determined by Colorado.	3.3.1.1 Approximately 14.3 percent of the population served by community water systems has “minimized risk by substantial implementation”. This population percentage is expected to increase in future reporting years, based on the number of source water protection planning grant applications received in 2014 and coordination with several large water providers (Denver/Fort Collins). Colorado is very close to achieving the fifteen (15%) milestone/performance measure agreed to in the FY2014 Region 8/State PPA target setting table.
3.4 Eliminate sanitary defects at public water systems that could increase the risk that contaminated drinking water will be distributed to consumers.	3.4.1 Conduct sanitary surveys (eight part) at public water systems as required by Primary Drinking Water Regulations. Percent of community water systems (CWSs) that have undergone a sanitary survey within the past three years (five years for outstanding performers or those groundwater systems approved by the state to provide 4-log treatment of viruses). FY14 planning target 79%. Every five years for non-community systems. Complete reports within 90 days of conducting field	3.4.1.1 The state will enter into SDWIS/STATE, the most recent sanitary survey date completed in the last three (3) years for all Subpart H Community Water Systems which have received a survey consistent with the eight part requirements of 40 CFR 142.16(b)(3) by January 31.	3.4.1.1 Sanitary surveys were conducted at public water systems as required by the Colorado Primary Drinking Water Regulations, and the most recent sanitary survey dates that have been completed at Subpart H systems were entered into SDWIS.
		3.4.1.2 In accordance with 40 CFR 142.15(a)(5), the state shall submit to the Region 8 Drinking Water Unit a list of all Subpart H Systems that have had a Sanitary Survey meeting the eight part requirements of 40 CFR 142.16(b)(3) during the prior calendar year by the end of January. The state may meet its obligation for such a list by entering the completion date of each required Subpart H System survey into Drinking Water Program an evaluation of its program	3.4.1.2 The completion date of each required Subpart H system is entered into SDWIS to meet the obligation of providing the list.  An evaluation of the state’s program for conducting Subpart H system sanitary surveys for calendar year 2013 will be submitted to EPA by the February 15, 2014 deadline.

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FFY 2014 Status and Accomplishments
	work.	for conducting Subpart H System Sanitary Surveys in accordance with 40 CFR 142.16(b)(3) during the prior calendar year as required by 40 CFR 142.15(a)(5) by February 15.	
		<p>3.4.1.3 Provide in the end-of-year report the number of CWSs that have undergone a sanitary survey and, the number and percentage of systems not surveyed within required timeframes in each of the following categories:</p> <p>a) Community groundwater systems not surveyed in the last 3 years;</p> <p>b) Community surface water systems not surveyed in the last 3 years; and</p> <p>c) Non-community water systems not surveyed in the last 5 years.</p> <p>The goal is that there will be fewer than 10% of systems in a) and c) not surveyed within the required time frames, and the goal for b) will be 5%.</p>	<p>3.4.1.3</p> <p>a) 29 (6.1%) of the community GW systems were not inspected in the last 3 years.</p> <p>b) 11 (4.9%) of the community surface water systems were not inspected in the last 3 years.</p> <p>c) 82 (7.2%) of the non-community water systems were not inspected in the last 5 years.</p> <p>The goals for a, b, and c were met.</p>
3.5 During FY 12/13 Colorado will partner with EPA to implement UCMR 3.	3.5.1 Colorado will enter partnership agreement with EPA to implement UCMR 3.	3.5.1.1 Implement sampling and reporting for UCMR 3 parameters as discussed in the UCMR partnership agreement.	3.5.1.1 UCMR 3 samples were collected from small systems per the requirements of the Sampling and Analysis Plan.
4.0 Compliance Assurance – Synthesize, coordinate and apply appropriate assistance tools, informal enforcement, formal enforcement and penalties to ensure timely correction of violations and deterrence.			
EPA 2011- 2015 Strategic Plan Goal 2: Protecting America's Waters, Objective 2.1 Protect Human Health Goal 5: Enforcing Environmental Laws, Objective 5.1, Supporting Goal 2			
4.1 Water Safe to Drink – Percent of population served by community water systems that receive drinking water that meets all applicable health based drinking water standards through approaches including effective treatment and source water protection. Regional target is 90%. Maintain a high overall compliance rate with all drinking water regulatory requirements.	4.1.1 Monitor self-reported data submitted by the state's drinking water supplies, to ensure that reported data meet all existing federal and state requirements; ensure reported data are accurately entered into the state's data system; and that violations are determined and	4.1.1.1 Percent of community water systems that provide drinking water that meets all applicable health-based drinking water standards. Strategic target is 90%.	4.1.1.1 = 89.8%
		4.1.1.2 Percent of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through effective treatment and source water protection. Strategic target is 92%.	4.1.1.2 = 98%



Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FFY 2014 Status and Accomplishments
PAM 2.1 Protect human health by reducing exposure to contaminants in drinking water.	responded to. Measure state outcomes against national targets.	4.1.1.3 Percent of “person-months” (i.e. all persons served by community water systems times 12 months) during which community water systems provide drinking water that meets all applicable health-based drinking water standards. Strategic target is 95%.	4.1.1.3 – Colorado is not able to generate this measure and relies upon EPA to do so.
4.2 Take action to address those PWSs that are identified and confirmed to be enforcement targets.	4.2.1 Manage the quarterly ETT to identify planned actions and to inform EPA of past quarter’s accomplishments.	4.2.1.1 Annotate the quarterly Enforcement Targeting Tool (ETT) list created by the Enforcement Response Policy (ERP) by indicating the state actions planned for each identified priority ETT system, the projected time frame for such actions, and other relevant information that helps EPA evaluate candidates for federal enforcement. Return the annotated list to EPA within 30 calendar days of receipt.	4.2.1.1 This commitment was met. Colorado obtains the quarterly ETT lists when they become available, provides the specified information and returns the annotated list to EPA
		4.2.1.2 The CDPHE is evaluating the state’s existing Enforcement Escalation Policy and will provide EPA staff with an update on the status of the revision process by September 30, 2014.	4.2.1.2 This commitment was met. Colorado submitted the update to EPA via letter on September 30, 2014.
		4.2.1.3 Address all priority ETT systems (through formal enforcement or appropriate return to compliance) within 6 months of their being identified as priorities, with the goal of taking action before systems reach the priority status. The date that the state receives the ETT from EPA is day zero (0) of the six-month timeliness period.	4.2.1.3 Colorado believes that this commitment has been met. However, the ETT makes it more difficult to generate this measure (than did the prior tool) and relies upon EPA to advise us if enforcement commitments have not been met.
	4.2.2 Provide information to facilitate EPA oversight of all state formal enforcement actions.	4.2.2.1 Provide EPA with access to State PWS files and data for EPA’s oversight purposes at the state’s offices. Provide EPA a copy of all final settlement agreements, both administrative and judicial, upon issuance or EPA request. Copies of actions will be provided to EPA Region 8 in electronic format unless EPA requests a hard copy. Upon request make penalty calculations and supporting documentation available to EPA.	4.2.2.1 Colorado provides, via electronic mail, a copy of all final enforcement documents to EPA at issuance.
5.0 SDWA Data Management – Develop and Implement a State Drinking Water Program database that will accurately portray system capacity, compliance and enforcement information.			

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	FFY 2014 Status and Accomplishments
EPA 2011 – 2015 Strategic Plan Goal 2: Protecting America’s Waters, Objective 2.1 Protect Human Health Goal 5: Enforcing Environmental Laws, Objective 5.1, Supporting Goal 2			
5.1 Maintain the federal database.	5.1.1 State sanitary survey activities will be accurately recorded and reported to EPA.	5.1.1.1 The state commits to entering all sanitary surveys performed within 90 days of completion of field work in the previous inspection year into SDWIS/FED (by December 31 for inspections conducted in the previous FFY).	5.1.1.1 Sanitary surveys completion dates are entered into SDWIS within the required 90 days.
	5.1.2 Enter required data into regional and national data systems so that federally required data fields are timely, accurate, and complete pursuant to definitions, guidance, and policy	5.1.2.1 Upload all enforcement actions and applicable return-to-compliance codes into SDWIS at least quarterly.	5.1.2.1 This commitment was met. Required data are uploaded to SDWIS/FED twice each quarter.
		5.1.2.2 Ensure that all enforcement actions are linked to violations in SDWIS to avoid orphan exceptions, except for the approved orphan actions identified in guidance.	5.1.2.2 This commitment has been met.

## 5.0 Hazardous Materials and Waste Management Division - FY 2014 Work Plan Status and Accomplishments

### Hazardous Waste Program

**Mission:** To ensure that all hazardous wastes are handled and managed in ways that protects the public and environment from the moment of waste generation until final disposal or destruction.

HW I - General Program			
Management and Partnership			
EPA 2011 – 2015 Strategic Plan Goal 3: Cleaning Up Our Communities			
HW 1: Long Term Goal Implement an efficient and effective hazardous waste regulatory program with adequate fiscal and personnel resources.			
Short Term Goals	Objective	Measures	Results
HW 2: Short Term Goal - Develop a partnership between the State and EPA that improves the program. Support this partnership and achieve efficient implementation of a hazardous waste program that reflects the goals and objectives of both the State and EPA including appropriate work sharing.	<b>Authorization</b> The State will pursue timely and complete authorization for new mandatory rules and progress toward overall authorization goals.	<b>FY14:</b> • RCRA Cluster XXI (SPA 33) (July 2011 – June 2012)	SPA 33 did not include any rules that Colorado was required to adopt. There were also no federal rules promulgated between July 1, 2012 and June 30, 2013.
	<i>EPA will work toward a timely review of authorization applications submitted and improve the overall pace of authorization and authorization flexibility. EPA will maintain timely reviews of authorization applications submitted by the State.</i>		
	<b>Program Improvement</b> The State will continue to evaluate the Hazardous Waste Control Program seeking to make further program improvements as appropriate.	Continued implementation of self-certification programs and GAP site visits.	HMWMD requested 915 self-certifications from hazardous waste generators in four different sectors (SQGs, Dry Cleaners, Long-Term Care facilities and High School chemistry laboratories) and conducted 15 GAP site visits.

<p>HW I - General Program</p> <p>Management and Partnership</p>			
	<p><b>Data Management</b></p> <p>The State will maintain timely, accurate, and complete data in RCRAInfo.</p> <p>Note: The State is currently a direct user of RCRA Info and translates only new evaluation data. Colorado has applied for an Exchange Network grant to translate compliance data.</p>	<p>The State will have data in RCRA Info by the 15<sup>th</sup> day of the month following activity. The EPA's EOY Report will be used to measure HMWMD's success.</p>	Done
		<p>The State will ensure that data is reported to RCRAInfo accurately and completely reflecting the status of the RCRA universe.</p>	Done
	<p>The State will continue to work with EPA to ensure that RCRAInfo reports used to track the progress of activity are accurate.</p>	<p>RCRAInfo reporting will include all key measures of operating, closure and post-closure permitting; corrective action; and compliance monitoring and enforcement components of the HW program at a level sufficient to support program evaluation efforts.</p>	Done
	<p><i>EPA will assist the State in assuring that the RCRAInfo data is current and accurate and reflects EPA HW activities as well as State activities.</i></p>		
	<p><i>EPA will work with the State to resolve "universe" issues.</i></p>		
	<p><i>EPA will provide training and technical assistance when requested.</i></p>		
	<p>The State and EPA will jointly create and generate RCRAInfo reports that are of benefit to the program.</p>		Done
	<p><b>Public Involvement.</b></p> <p>The State will continue to involve the public as required by statute and regulation or MOA. This includes a system to respond to requests for information and complaints or concerns from the public.</p>	<p>CDPHE will:</p> <ul style="list-style-type: none"> <li>• Log all complaints and track response and resolution of all complaints.</li> <li>• Log all requests for information and track response and resolution.</li> </ul>	<p>CDPHE received 78 complaints in the hazardous waste program. After review, Hazardous Waste Program staff inspected 52 of the complaints and referred 26 to other CDPHE programs or to local government agencies for follow-up.</p>

<p>HW I - General Program</p> <p>Management and Partnership</p>			
	<b>Resource Level</b> The State will maintain adequate resources to implement the program.		Done
	<b>Financial Accountability</b> The State will adequately account for grant dollars.		Done
	<b>Program Guidance / Agreements</b> The State and EPA will jointly develop and maintain the MOA/EA, Quality Assurance Plan and other operating Guidance.		A new MOA was signed 11/6/13.
	<b>Strategic Planning</b> The State and EPA will jointly plan and prioritize program goals, objectives and activities that address state and federal priorities and initiatives. Activities include PPA development, Annual National targets, inspection strategies, planning meetings, etc.	EPA and the State will hold meetings to share information, identify and solve problems, and engage in short term planning efforts.	Done. Meetings and telephone calls were scheduled as needed.
	<b>Coordination of Joint Activities</b> The State and EPA will maintain a high level of cooperation between State and EPA staff to assure successful and effective administration of the program including evaluation of desirable technical support.	EPA and the State will hold meetings to share information, identify and solve problems, and engage in short term planning efforts.	Done. Meetings and telephone calls were scheduled as needed.
	<b>Program Communication</b> The State and EPA will maintain frequent and open communication on routine matters, changes in program capability, legislation and resources levels, emergency situations and other key activities as described in the MOA.	Examples of key activities include final decisions re: variances / waivers, enforcement actions, biennial report summarization, final permits, etc.	Done. Meetings and telephone calls were scheduled as needed.
		EPA and the State will hold meetings to share information, identify and solve problems, and engage in short term planning efforts.	Done. Meetings and telephone calls were scheduled as needed.

<b>HW I - General Program</b> <b>Management and Partnership</b>			
	<b>Training and Technical Assistance</b> The State and EPA will jointly identify training and technical assistance needs.	The State will develop and implement a staff training program that results in well-qualified staff and ensures that mandatory training needs are met.	Done
		<i>EPA will make training and technical assistance available to the State and will work toward improving the capability to provide high quality training and technical assistance. Technical assistance will be made available through EPA staff, EPA research labs and EPA contractors.</i>	
	<i>EPA will conduct oversight of State program activities as appropriate.</i>		
<b>HW 3: Short Term Goal –</b> The State and EPA will work together to determine progress in identifying and achieving environmental indicators. Actions necessary to achieve environmental indicators will be planned and tracked. Determination documentation for those facilities “under control” will be provided by the State to EPA; EPA will, in turn, provide guidance for what constitutes “adequate documentation”.		See “Table HW IV” below.	

<b>HW II</b> <b>Operating Permit and Closure/Post Closure Permit Goals</b>	
EPA 2011 – 2015 Strategic Plan Goal 3: Cleaning Up Our Communities, Objective 3.2 Preserve Land	

**HW II**  
**Operating Permit and Closure/Post Closure**  
**Permit Goals**

**HW Operation Permit Universe Information:**

There is only one (1) commercial land disposal facility operating within the State; as of the end of FY14, this facility has the required permit. There are eight (8) operating commercial and non-commercial treatment / storage facilities operating in the State; as of the end of FY14, all required operating permits have been issued, although 1 unit at 1 facility (storage igloos at PCD) is deemed “interim status,” but will be closed before it is permitted. Currently, there are no (0) operating combustion units within the State. An RD&D Permit has been issued for the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) facility to allow for construction. PCAPP is now 100% constructed.

Short Term Goals	Objective	Measures	Results
HW 4: Short Term Goal: Issue and maintain operating permits, closure plans, and post-closure permits that include conditions necessary to assure that hazardous wastes are managed in ways that will protect public health and environmental quality. Ensure protection of public health and the environment by inspecting facilities to determine their compliance with permit or closure plan conditions.	<b>Operating Permit Activities.</b> The State will demonstrate progress toward achieving operating permits (OP) program goals, objectives and activities identified in jointly developed strategies that reflect State and EPA OP priorities.	The Key Measure of the OP process is: <ul style="list-style-type: none"> <li>OP200 – final determinations / renewal determinations.</li> </ul> Supporting Measures include: <ul style="list-style-type: none"> <li>OP100 – review activities resulting in a determination or notice of deficiency:</li> <li>OP240 – permit modifications; and</li> <li>Emergency Permits.</li> </ul>	
		The following output is planned:  <b>FY14:</b> <ul style="list-style-type: none"> <li>No (0) treatment, storage and disposal facility needs to obtain an operating permit final determination. ]</li> <li>One (1) TSD facilities are anticipated to obtain a permit.</li> </ul>	The following output was accomplished:  <b>FY14:</b> <ul style="list-style-type: none"> <li>Done. The PCD permit renewal was completed first quarter FY2014.</li> </ul>
	Permit maintenance; permit modifications, and emergency permits will be processed as required.	Permit modifications and emergency permits will be processed as received and required.	The following emergency permit and permit modification activities occurred: <ul style="list-style-type: none"> <li>12 Emergency Permits were issued</li> <li>20 Class 1 permit mods were issued</li> <li>3 Class 2 permit mod was issued</li> <li>1 Class 3 permit mod was issued</li> <li>3 Agency-initiated permit mods were issued</li> </ul>

<b>HW II</b> <b>Operating Permit and Closure/Post Closure</b> <b>Permit Goals</b>			
	<i>EPA will conduct operating permit activities according to the joint permitting process described in the authorization memorandum of agreement.</i>		
	<i>EPA will provide technical assistance where requested.</i>		
<b>HW Closure Universe Information:</b> There are or have been thirty-three (33) treatment/storage/disposal facilities with land disposal units on the closure track, and seventy-six (76) land disposal units at these facilities. All of the 76 land disposal units have approved closure plans. Two (2) facilities still have land disposal units that need closure certification and agency verifications (DuPont and Fruita). Sixty-one (61) treatment/storage/disposal facilities have treatment or storage units on the closure track. Most of these treatment or storage units have had their closure plans approved. The only units without approved closure plans are units that have been referred to the CERCLA remedial process. All four (4) treatment/storage/disposal facilities with combustion units have completed the closure process.			
HW 4 (cont'd) Issue operating permits	<b>Closure Activities –</b> The State will demonstrate progress toward achieving closure (CL) program goals.	The Key Measure for closure activities is: <ul style="list-style-type: none"> <li>• CL360 - Closure plan approval.</li> <li>• CL380 - Closure verification</li> <li>• CL370 - Closure certification</li> </ul>	
		The following outputs are planned: <b>FY14:</b> <ul style="list-style-type: none"> <li>• No (0) treatment / storage units will receive closure plan approval</li> <li>• Two (2) treatment / storage units will receive closure verification</li> <li>• One (1) closure certifications will be approved</li> </ul>	The following outputs were accomplished: <b>FY14:</b> <ul style="list-style-type: none"> <li>• One (1) treatment / storage unit received closure plan approval.</li> <li>• Five (5) treatment / storage units received closure verification</li> <li>• Five (5) treatment / storage units received closure certifications</li> </ul>
	<i>EPA will participate in closure determinations through joint activities and providing technical assistance where requested</i>		
<b>HW Post Closure Universe Information</b> There are twenty-seven (27) facilities in the post-closure universe in the state as of the end of FY12. The Division has lead for all of these facilities excluding three (3) superfund sites. All required post-closure permits or other approved controls are in place.			
<b>Short Term Goals</b>	<b>Objective</b>	<b>Measures</b>	<b>Results</b>



<b>HW II</b> <b>Operating Permit and Closure/Post Closure</b> <b>Permit Goals</b>			
HW 4 (cont'd) Issue operating permits	<b>Post-Closure Activities –</b> The State will demonstrate program progress toward achieving post-closure (P-C) program goals, objectives and activities that reflect State and EPA P-C priorities.	The Key Measure is: <ul style="list-style-type: none"> <li>• PC200 – final post-closure permit determinations/ issuances. Post-Closure plan approvals, or other approved controls for all applicable units at facilities in the GPRA post-closure universe.</li> </ul> Supporting measures are: <ul style="list-style-type: none"> <li>• PC300 – other final post-closure permit determinations / issuances.</li> <li>• PC010 – post closure permit call-ins.</li> </ul>	
		The following major outputs are planned: <b>FY14:</b> <ul style="list-style-type: none"> <li>• No (0) post-closure permits will be renewed</li> <li>• No (0) other final or other post-closure permit determinations / issuances are expected.</li> <li>• No (0) post-closure permit call-ins are expected.</li> </ul>	The following major outputs were accomplished: <b>FY14:</b> <ul style="list-style-type: none"> <li>• No post-closure permit activities occurred.</li> </ul>
	<i>EPA will participate through joint activities and by providing technical assistance as requested.</i>		
HW 5: Short term Goal Develop mechanisms to improve state-to-state cooperation on permitting of promising innovative waste remediation technologies and the development of such technologies.	HW 2.1.3 Participate in Interstate Technology and Regulatory Cooperation Workgroup.		Done
<i>EPA will conduct oversight of State operating, closure, and post-closure permitting activities.</i>			

**HW III**  
**Compliance Monitoring and Enforcement Goals**

EPA 2011 – 2015 Strategic Plan Goal 3: Cleaning Up Our Communities  
 Goal 5: Enforcing Environmental Laws, Objective 5.1, Supporting Goal 3

HW 6: Long Term Goal  
 Ensure protection of public health and environment through achieving compliance of regulated facilities by implementation of an effective monitoring and enforcement program. Detect and deter violations through inspections and enforcement actions and promote compliance with hazardous waste requirements.

Outcome Measures:  
 Return to compliance after enforcement is an important measure of the effectiveness for the enforcement and inspection program. Informal and formal enforcement actions issued in the reporting year are used as the basis for this measure. The measure is the percentage of compliance requirements that are met during the reporting year that they fall due. This measure is expected to be 80% or more in FY13.

Short Term Goals	Objective	Measures	Results
HW 6.1: Short Term Goal Ensure that annual inspection requirements are achieved and that inspections are of high quality. Inspections of treatment, storage and disposal facilities will meet the statutory requirements.	All federal and state TSDs will be inspected. Inspections of state TSDs will be conducted jointly with EPA, with EPA acting as the lead in the inspections.	During FY14, 100% of the compliance inspections required by statute will be conducted.	100% of all required 2014 inspections were conducted.
	All active land disposal facilities will be inspected. All those in post-closure will be inspected every other year (every two years).	CDPHE will submit to EPA, by November 15 of each year, an inspection work plan for the upcoming federal fiscal year, which includes the names of TSD and LQG facilities.	2014 inspection schedule was submitted to EPA before 11/15/13.
	Ground water monitoring inspections will be conducted at active land disposal facilities that have not had such inspections in the previous two years (every three years) or as agreed to by the State and EPA.	A minimum of twenty percent (20 %) of all large quantity generators (LQGs) will be inspected during each fiscal year and 100% of all LQGs will be inspected every 5 years.	100 % of LQGs who persisted in the universe over a 5 year period were inspected.
	All treatment and storage facilities will be inspected every other year (every two years).		
	Other Priority Inspection Areas <ul style="list-style-type: none"> <li>- Permit Evaders</li> <li>- Surface Impoundments</li> <li>- Mineral processors</li> <li>- Waste Analysis Plans at commercial TSDFs</li> </ul>		

<b>HW III</b> <b>Compliance Monitoring and Enforcement Goals</b>			
	<p><i>The Region commits to work with the State to identify 2 TSDFs and 2 LQGs which the Region will inspect as lead. The LQGs will be identified from the national and regional priority sectors, illegal recyclers, entities with violations in more than one state, environmentally sensitive environment, unpermitted surface impoundments, improper medical waste disposal, coal combustion waste facilities, areas of environmental justice concerns and particularly recalcitrant violators.</i></p>		
HW 6.2: Short Term Goal Maintain a high level of expertise to ensure that quality inspections consistent with national guidance are being conducted.	High quality inspections will be conducted in accordance with national guidance to be reviewed jointly by the State and EPA in the annual assessment.	EPA EOY State Review Framework Evaluation	Done
<i>EPA Region 8 will continue to implement the CERCLA Off-Site Rule (OSR). EPA will continue to coordinate closely with the state in this implementation.</i>			
HW 6.3: Short Term Goal Promote compliance of regulated facilities by ensuring that enforcement actions are timely. Actions necessary to assure return to compliance (RTC) and consistent with the Enforcement Response Policy will be documented.	Informal actions will be taken as appropriate within the timeframes established in the HMWMD Enforcement Response Policy.	Compliance Advisories (informal enforcement mechanism) will be used as appropriate and consistent with the State's Enforcement Response Policy.	Done
	Formal enforcement actions, such as administrative orders, judicial referrals and referrals to EPA will be taken as appropriate and within the time frames established in the MOA and the HMWMD Enforcement Response Policy.	Formal enforcement actions will include the use of compliance schedules, assessment of penalties, and escalation of enforcement action as appropriate for the violation and consistent with the HMWMD Enforcement Response Policy.	Done

HW III Compliance Monitoring and Enforcement Goals			
	Enforcement follow-up and other activities will be conducted in accordance with the HMWMD Enforcement Response Policy.	Follow-up will include compliance schedules, follow-up inspections, and compliance assistance and / or escalation of enforcement responses as appropriate and consistent with the HMWMD Enforcement Response Policy.	Done
	<i>The State and Region 8 will work together to move closure/post closure and corrective action facilities to compliance with financial assurance requirements through the development of enforcement cases which may be taken by either the State or EPA. Region 8 will be the lead for entities with facilities in more than one state.</i>	The State and EPA will share any information that is collected regarding the environment and / or public health benefits achieved through inspection and enforcement activities.	Done
	<i>Other national enforcement priority areas: Region 8 will continue to support the multimedia Energy Extraction initiative</i>		
<i>EPA and the State will work jointly to assure that the review of enforcement actions is timely and appropriate in accordance with the Enforcement Response Policy. Actions necessary to assure return to compliance (RTC) and consistent with the Enforcement Response Policy will be documented.</i>	<i>EPA will conduct mid-year and end of year file reviews to document the progress CDPHE has made on timeliness of enforcement actions and the appropriate assessment and collection of penalties, including gravity, economic benefit and multi-day penalties.</i>	The State and EPA will have coordination meetings to discuss the compliance and enforcement program. EPA's EOY Report and EPA's State Review Framework Evaluation will be used to judge the quality of HMWMD's Program.	Done. Meetings and telephone calls were scheduled as needed.

HW IV Corrective Action Goals
EPA 2011 – 2015 Strategic Plan Goal 3: Cleaning Up Our Communities, Objective 3.3 Restore Land
Corrective Action GPRA Universe Information: There are 44 high-priority facilities on Colorado's GPRA 2020 corrective action baseline. Of those facilities, all have been assessed - the RFA is complete ( <b>CA050</b> ), and all have been prioritized ( <b>CA075</b> ), according to RCRAInfo.

HW IV Corrective Action Goals			
Short Term Goals	Objective	Measures	Results
HW 7: Long Term Goal Clean up releases of hazardous waste that threaten the public or the environment.	<b>Corrective Action Identification and Ranking</b> The State will demonstrate progress toward achieving corrective action program identification ranking goals, objectives and activities that reflect State and EPA priorities.	The Key Measures for corrective action progress are: <ul style="list-style-type: none"> <li>• CA 050 –assessment completed;</li> <li>• CA 070 – determination of need for RFI; and</li> <li>• CA 075 – corrective action universe ranking.</li> </ul>	
		The following outputs are planned: <b>FY14:</b> All assessment and ranking activities have been completed; therefore, no activities are planned	The following outputs were accomplished: <b>FY14:</b> No (0) assessment and ranking activities were completed
	<i>EPA will provide technical assistance in identification and ranking activities as appropriate.</i>		
GPRA Corrective Action Universe Information: There are forty-four (44) facilities on Colorado’s GPRA 2020 Corrective Action Baseline. All 44 have had the CA process started with at least a RCRA Facility Investigation (RFI) imposed ( <b>CA100</b> ) for at least one area. Thirty-seven (37) have had RFIs approved ( <b>CA200</b> ) for at least one area. Thirty-five (35) have had a remedy selected ( <b>CA400</b> ) for at least one area. Thirty (30) have had a remedy construction completed ( <b>CA550</b> ).			
HW 7: Long Term Goal Clean up releases	<b>Corrective Action Progress</b> The State and EPA will demonstrate progress toward achieving corrective action program goals, objectives and activities that reflect State and EPA priorities. Emphasis will be placed on high-ranked facilities.	The Key Measures for Corrective Action are the following activities: <ul style="list-style-type: none"> <li>• CA100 – Initial RCRA Facility Investigation (RFI) imposed;</li> <li>• CA100 – Subsequent RFI imposed;</li> <li>• CA150 – RFI work plan approved;</li> <li>• CA200 – RFI approved</li> <li>• CA300 – Corrective Measure Study (CMS) work plan approved;</li> <li>• CA350 – CMS approved;</li> <li>• CA400 - Remedy Selection</li> <li>• CA500 – Corrective Measure (CM) work plan approved;</li> <li>• CA550 - Corrective Measures implemented (CMI), construction completed</li> </ul>	

HW IV Corrective Action Goals			
		<ul style="list-style-type: none"> <li>CA999 – Corrective Action complete</li> </ul>	
HW 7: Long Term Goal Clean up releases ....	Corrective Action Progress (Cont'd)	<p>The following key outputs are planned: <b>FY14:</b></p> <ul style="list-style-type: none"> <li>No (0) initial RFIs imposed.</li> <li>No (0) subsequent RFIs imposed.</li> <li>Three (3) RFI work plans approved.</li> <li>Six (6) RFI reports approved.</li> <li>One (1) CMS work plans approved.</li> <li>One (1) CMS report approved.</li> <li>Three (3) remedies selected at the unit level.</li> <li>No (0) remedies selected at the facility level.</li> <li>Two (2) CM work plans approved.</li> <li>Five (5) CMI construction completed at the unit level.</li> <li>No (0) CMI construction completed at the facility level.</li> <li>No (0) corrective action completed.</li> </ul>	<p>The following outputs were accomplished: <b>FY14:</b></p> <ul style="list-style-type: none"> <li>No (0) initial/subsequent RFIs imposed</li> <li>No (0) RFI Work Plans were approved</li> <li>Five (5) RFI Reports approved 3-GSA, 1-E.I.Dupont, 1-Evraz</li> <li>Two (2) CMS work plan approved, 1-GSA, 1-Ft.Carson</li> <li>Six (6) CMS reports approved, 5-GSA, 1-Ft.Carson</li> <li>Ten (10) remedies selected at unit level 5-GSA, 1-Evraz, 4-Ft.Carson</li> <li>No (0) remedies selected at the facility level</li> <li>Ten (10) CM work plans approved, 5-GSA, 2-E.I.Dupont, 1-Evraz, 2-Ft.Carson</li> <li>Twenty Three (23) CMI construction completed at the unit level. 4-E.I.Dupont, 1-GSA, 8-PJKS, 4-Evraz, 4-Ft.Carson, 2-ChemDepot</li> <li>No (0) CMI construction completed at the facility level</li> <li>Seven (7) Corrective Action Complete 11-Evraz, 1-GSA, 3-E.I.DuPont, 3-Ft.Carson</li> </ul>

HW IV Corrective Action Goals			
	<i>EPA will conduct corrective action activities at EPA-lead facilities and will conduct joint activities and provide technical assistance, as appropriate. Specifically EPA has assumed the lead for corrective action at two (2) facilities. Both are anticipated to become a state-lead facility.</i>		
<p>Stabilization Universe Information</p> <p>Twenty-three (23) of the forty-four (44) high-ranked CA baseline universe facilities are in the stabilization universe. That is, the stabilization measures evaluation (CA225) resulted in a finding that stabilization measures are appropriate. Stabilization measures have been imposed (CA600) at twenty-two (22) of the facilities. Stabilization construction completion (CA650) has occurred at seventeen (17) facilities.</p>			
HW 7: Long Term Goal Clean up releases ....	<p><b>Stabilization Activities (Interim Measures) -</b></p> <p>The State will demonstrate progress towards achieving stabilization program goals, objectives and activities that reflect State and EPA priorities. Emphasis will be on increasing the number of facilities at which current human exposures and releases to ground water have been controlled and on facilities that are ranked as “high”.</p>	<p>The Key Measures are the following stabilization activities:</p> <ul style="list-style-type: none"> <li>• CA225 - Stabilization Measures Evaluation</li> <li>• CA600 - Stabilization Implemented</li> <li>• CA650 - Stabilization Construction completed</li> </ul>	
	Stabilization Activities (Interim Measures) Cont'd	<p>The following stabilization outputs are planned:</p> <p><b>FY14:</b></p> <ul style="list-style-type: none"> <li>• No (0) Stabilization Measure Evaluations.</li> <li>• No (0) Stabilization Implemented.</li> <li>• No (0) Stabilization Construction completed.</li> </ul>	<p>The following outputs were accomplished:</p> <p><b>FY14:</b></p> <p>One (1) Stabilization implemented 1-E.I.Dupont</p> <p>One (1) Stabilization construction complete 1-E.I.Dupont</p>
	<i>EPA will conduct Stabilization activities at EPA-lead facilities and will conduct joint activities and provide technical assistance, as appropriate.</i>		

<b>HW IV</b> <b>Corrective Action Goals</b>			
<b>HW Indicator 2</b> The State will continue to evaluate the number and percentage of facilities with human exposures under control ( <b>CA725</b> ). Note: The definition of “under control” is in USEPA Region 8 RCRAInfo Definition Table, and in EPA guidance (2/5/99) for RCRA corrective action environmental indicators.			
<b>GPRA Corrective Action Universe Information:</b> There are Forty-four (44) facilities in the 2020 Corrective Action Universe. Forty-four (44) of these 44 are under control with regard to human exposure as of the end of FY14.			
<b>HW 7: Long Term Goal</b> Clean up releases ....	The state will work to get human exposure under control at facilities subject to corrective action. Documentation will be submitted to EPA for all facilities that have achieved this environmental indicator.	The Key Output is the number of GPRA Baseline facilities at which human exposures are under control (CA725). The following Key Outputs are planned: <b>FY14:</b> <ul style="list-style-type: none"> <li>No (0) facility is projected to achieve this environmental indicator</li> </ul>	<b>FY14:</b> Two (2) facilities achieved this environmental indicator <ul style="list-style-type: none"> <li>1-Ft.Carson, 1-PCD</li> </ul>
	The State will update the facility-specific strategies, identifying when each high –ranked corrective action facility presently not under control is anticipated to meet this environmental indicator and to develop plans to achieve all projected Environmental Indicators.	The cumulative total in Colorado at the conclusion of FY14 will be 93%.	The cumulative total in Colorado at the conclusion of FY14 is 100%.
<i>EPA has a national goal of having human exposures controlled at 95% of the GPRA Baseline facilities by FY 2005 (HW-11-24)</i>	<i>EPA will work to get human exposures under control at EPA-lead facilities and will provide technical assistance as appropriate.</i>		
	<i>EPA will update facility-specific strategies, identifying when each high – ranked corrective action facility presently not under control is anticipated to meet this environmental indicator and to develop plans to achieve all projected Environmental Indicators.</i>		



<b>HW IV</b> <b>Corrective Action Goals</b>			
HW Indicator 3 The State will continue to evaluate the number and percentage of facilities with ground water releases under control ( <b>CA750</b> ). Note: The definition of “under control” is in USEPA Region 8 RCRAInfo Definition Table, and in EPA guidance (2/5/99) for RCRA corrective action environmental indicators.			
GPRA Corrective Action Universe Information: There are Forty-four (44) facilities in the 2020 Corrective Action Universe. Forty-Three (43) of these 44 are under control with regard to ground water releases as of the end of FY14.			
HW 7: Long Term Goal Clean up releases ....	The state will work to get the migration of contaminated ground water under control at facilities subject to corrective action. Documentation will be submitted to EPA for all facilities that have achieved this environmental indicator.	The Key Measure is the number of GPRA Baseline facilities at which migration of contaminated ground water are under control (CA750). The following Key Outputs are planned: <b>FY14:</b> <ul style="list-style-type: none"> <li>One (1) facility is projected to achieve this environmental indicator</li> </ul>	<b>FY14:</b> One (1) facility achieved this environmental indicator, 1-Suncor
	The State will update the facility-specific strategies, identifying when each high –ranked corrective action facility presently not under control is anticipated to meet this environmental indicator and to develop plans to achieve all projected Environmental Indicators.	The cumulative total in Colorado at the conclusion of FY14 will be 98%.	The cumulative total in Colorado at the conclusion of FY14 is 98%.

<b>HW V</b> <b>Pollution Prevention &amp; Compliance Assistance Goals</b>			
EPA 2011 – 2015 Strategic Plan Goal 3: Cleaning Up Our Communities, Objective 3.2 Preserve Land			
HW 9: Long Term Goal Implement a compliance assistance program that increases the compliance rate within HMWMD’s regulated communities.			
<b>Short Term Goals</b>	<b>Objective</b>	<b>Measures</b>	<b>Results</b>

<b>HW V</b> <b>Pollution Prevention &amp; Compliance Assistance</b> <b>Goals</b>			
	A schedule of quarterly compliance assistance workshops and training sessions will be established. Trainings provide compliance guidance to attendees.	Presentation of hazardous waste compliance assistance seminars, workshops, and/or training sessions: <ul style="list-style-type: none"> <li>Estimate 15 to 20 sessions with 1000 attendees each federal fiscal year.</li> </ul>	16 trainings were conducted that included 1,050 attendees.
	Site visits will be made to provide compliance assistance to selected individual businesses that request assistance or that are identified during routine hazardous waste inspections.	Implementation of the Generator Assistance Program (GAP).	15 GAP site visits were conducted.
<b>HW 10: Long Term Goal</b> Implement a pollution prevention program that encourages reduction of the amount and toxicity of wastes generated through waste minimization, treatment, and recycling of hazardous wastes, thereby reducing the risks associated with waste management. Methods for tracking and quantifying the accomplishments of these efforts will continue to be developed.			
	Pollution prevention training will be incorporated into compliance assistance trainings, as appropriate.	Done in conjunction with compliance assistance.	Done
	Distribute pollution prevention information and guidance documents in response to specific requests.	Done in conjunction with compliance assistance and inspections.	Done
<b>HW 11: Long Term Goal</b> Integrate compliance assistance, waste minimization, pollution prevention, waste diversion, and recycling into all program activities and support waste minimization efforts statewide.			
	Develop and implement compliance assistance elements within the inspection and enforcement processes.	Provide direct compliance assistance in inspections: <ul style="list-style-type: none"> <li>Estimate 20 inspections in each federal fiscal year.</li> </ul>	Compliance assistance and/or pollution prevention information was delivered on 203 of the 326 inspections conducted.
	Distribute pollution prevention information and guidance documents in response to specific requests.	Done in conjunction with compliance assistance.	Done

HW V Pollution Prevention & Compliance Assistance Goals			
	Support and maintain the technical assistance phone system.	<ul style="list-style-type: none"> <li>Estimate 3000 responses during each federal fiscal year.</li> </ul>	2173 calls and 505 emails were responded to in FY14.
	On the CDPHE homepage, provide updates in the hazardous waste activities and access to current compliance assistance and pollution prevention materials and documents.	<ul style="list-style-type: none"> <li>Maintain homepage information and track usage by Division customers</li> <li>Estimate over 1,000,000 contacts during each federal fiscal year.</li> </ul>	In FY14, we were unable to track the number of hits received by our website. We hope to be able to track this again sometime within FY15.
<i>EPA has a goal of building Sustainable Materials Management (SMM) capacity in all Region 8 states.</i>	<i>EPA will provide SMM assistance to Colorado, as requested priorities arise.</i>	<i>Reduction of Waste disposed.</i>	
<i>EPA will continue to support the environmental Compliance Assistance Center (ECAC) for all auto service businesses that request compliance assistance information. The center is based in Colorado and is available to all states.</i>			

## State Indoor Radon Grant

Mission: The State Indoor Radon Grant is used to develop effective, efficient activities that increase the awareness of radon health risks in Colorado. Emphasis is placed on raising awareness of radon issues, increasing testing rates and encouraging mitigation in response to elevated radon levels. Homeowners, local governments, realtors and builders will continue to be target groups for information about radon testing and radon-resistant new construction. Distribution of funding to local health departments, cooperative extension offices and other entities at the local level will ensure coverage throughout Colorado. Annual surveys will be conducted on measurement results, mitigation providers, builders and schools as requested by the EPA Radon Reinvigoration Strategy.

State Indoor Radon Grant Goals				
EPA 2010 – 2015 Strategic Plan Goal 1 Taking Action on Climate Change and Ensuring Air Quality, Objective 1.4 Reduce Unnecessary Exposure to Radiation				
RA 1: Long-term goal Increase radon awareness. Assure that Colorado homes continue to be tested for radon, with intervention to reduce radon risk if a test result calls for action.				
Short-term goal	Objectives	Performance measures	Milestones	Results

State Indoor Radon Grant Goals				
RA 1.1 Increase awareness, testing and mitigation of homes with elevated radon levels. Work toward adoption of more radon-resistant building codes.	Contract through the grant for products and services that improve radon awareness, testing, and mitigation in Colorado.	Number and/or percent of homes that have been mitigated for elevated radon levels.	Number of homes that have been mitigated for radon.	It is estimated that 7,200 homes in Colorado were mitigated for radon in 2013.
	Provide current information to homeowners, real estate agents, buyers, sellers, and builders about radon testing and mitigation.	Percentage of homes tested for radon.	Number of homes that have been tested for radon.	It is estimated that 32,915 homes were tested for radon in Colorado in 2013
RA 1.2 Strengthen radon public health activities in Colorado's zone 1 (high radon potential) counties.	Work with volunteer municipalities and counties to adopt construction standards to reduce radon in residential, school, and public buildings.	Number of homes in each county that have been built using radon-resistant features.	Number of homes and schools built radon resistant and number of local governments adopting radon resistant new construction building codes	It is estimated that 800 homes, schools and other buildings were built with RRNC in 2013. Twenty-six cities and/or counties in Colorado have adopted RRNC building codes.
	<i>EPA: EPA will offer assistance in public outreach efforts, help coordinate activities of the state and the Western Regional Radon Training Center, provide support for the contracts with counties and partners that have been established and offer manpower at events.</i>			
	<i>EPA: EPA will also forward relevant information from HQ or other entities to the state. Guidance will be provided as needed on the information.</i>			
	<i>EPA: EPA will also provide support to the state in the creation of radon-related policy statements or programs such as the radon proficiency program.</i>			

State Indoor Radon Grant Goals				
	<i>EPA: EPA will review annual reports submitted by the state and offer a response that assures that the work plan agreed to is being followed and goals are being met.</i>			